

APPENDIX 4 - Consultation Record

Citizen Space Consultation 3rd March to 1st April 2016



Consultee Name	Consultee Comment	FC Response
STATUTORY		
Devon CC	No Response	-
Dartmoor NPA	<p>Norman Baldock our Senior ecologist has some additional comments to add:</p> <ul style="list-style-type: none"> - It would be good to see more feathered edges planned to cover a greater length of the plantation boundaries, especially at Fernworthy - The suggested amenity planting of the strip along the southern edge of Soussons seems like a reasonable idea in part, as long as it incorporates some feathering into the existing plantation rather than just being an expansion of the woodland - There is repeated reference in the concept proposals about complementing the adjacent SSSIs where appropriate in order to help restore 'favourable condition'. In addition to the feathered edges being more widespread, I think this document ought to mention their responsibility and desire to control regenerating Sitka and other conifers that at spreading into the surrounding heathlands. - Not sure why they have grey alder in some of their broadleaf mixes – is there any reason not to have glutinosa instead? Red alder is also listed, but I believe that it does have some economic value? 	<p>Over 3000m of hard edge have been addressed in the Plan, focused on the most exposed and prominent locations. The landscape benefit of additional feathered edge creation is disputed.</p> <p>Prescription to combining amenity planting and clumpy open space creation with restocking of 82539a is outlined on page 44.</p> <p>Seeding trees is not the reason for 'unfavourable' condition. Forest Enterprise will not take responsibility for non-invasive species control on SSSI outside of its landholding, how we are willing to discuss management with Duchy of Cornwall if re-generation becomes prolific.</p> <p><i>Alnus incana</i> has a wider site tolerance to <i>Alnus glutinosa</i> and <i>Alnus rubra</i>– Page 17 makes note of <i>glutinosa</i> as a possible</p>
Natural England	At this time Natural England have no comment to make. Once the Appendix 5 is made available we will be able to comment further.	Appendix 5 will be appended and NE consulted by Forest Services when submitted for approval.
Environment Agency	<p>Comments from Nick Whatley: Part 5/Conservation & Appendix 1/Water Management/Riparian Management: We are supportive of the objective to extend and buffer priority habitats, particularly wet woodland. This habitat should be extended within the riparian zones (referenced in appendix 1). We are pleased to see that some riparian areas (14ha) have been identified for native planting/regeneration but we would like to see this area extended to include more stream corridor length throughout the forests. Natural watercourse buffers help us to meet water quality objectives (Water Framework Directive) and deliver natural flood alleviation for downstream communities. Several waterbodies within these catchments are failing to reach good ecological status, largely due to pH. In the upper reaches of the rivers, the loss of natural tree cover and planting of conifers can contribute to a decline in water quality. Deciduous trees help buffer rain acidity, diffuse pollution from agricultural practices and past mining activity. Conifers out-compete native undergrowth and their needles increase soil acidity, whilst native deciduous trees and plants help stabilise soil and their calcium-rich leaves make soil more alkaline. Native trees alongside watercourses also help reduce sedimentation and improve habitat for macrophytes and invertebrates. Less acidic conditions benefit fish, including spawning Salmon. Re-wilding streams and woody debris dams will help filter water and hold back flood flows. Improved forestry operations (cultivation, harvesting, drainage and forest tracks) can help to reduce erosion, sedimentation, turbidity and pollution. Additional measures to intercept flow pathways include runoff diverter berms on forest tracks. Where possible, we would like to influence these areas to maximise opportunities for improving water quality, flood attenuation and habitat restoration. We are developing a 'Dartmoor Headwaters Project' to try and address these issues and we are keen to work with the Forestry Commission on this.</p> <p>Comments from Margaret Waite: 1. Fernworthy forest block lies within the safeguard zone for Fernworthy Reservoir drinking water protected area (DrWPA). Under Article 7.3 of the Water Framework Directive Fernworthy Reservoir is at risk for colour. As a result South West Water (with their delivery partner Devon Wildlife Trust) is undertaking a catchment management scheme within the safeguard zone with the aim of improving water quality in terms of colour. Wherever possible the management of the Fernworthy forest block needs to be undertaken in such a way as to minimise impact on the water quality of Fernworthy Reservoir, particularly in relation to colour. 2. Soussons, Bellever and Brimpts forest blocks lie within the safeguard zone for the Dart drinking water protected area. Under Article 7.3 of the Water Framework Directive the Dart DrWPA is at risk for pesticides. As a result South West Water (with their delivery partners Devon Wildlife Trust and Westcountry Rivers Trust) is undertaking a catchment management scheme within the safeguard zone with the aim of improving water quality in terms of pesticides. (The safeguard zone for the Dart DrWPA includes the East Dart, West Dart, Cherry Brook, Walla Brook and West Webburn river, all of which run close to the forest blocks). Wherever possible the management of the Soussons, Bellever and Brimpts forest blocks needs to be undertaken in such a way as to minimise impact on the water quality of the Dart DrWPA, particularly in relation to pesticides. (Pesticides include herbicides, fungicides, insecticides etc). 3. It should be noted that in AMP6 (2015-2020) South West Water are undertaking an investigation to understand the condition of the peat across Dartmoor. The investigation will also identify priority areas for the restoration of the Mires across Dartmoor, with the aim of achieving benefits in terms of water quantity, water quality, biodiversity, habitats, carbon storage etc. Wherever possible the management of the Fernworthy, Soussons, Bellever and Brimpts forest blocks needs to be undertaken in such a way as to minimise impact on the condition of the peatland within the vicinity of these forests.</p>	<p>Page 39 makes the following statements to address these comments</p> <p><i>All felling and restocking operations will work within the guidelines set out in UKFS, Forests and Water with the aim of developing further riparian areas at the time of intervention through heavier thinning of conifer and stimulating native species regeneration.</i></p> <p><i>Fernworthy Forest is an integral component in the supply of the Fernworthy Reservoir. The Reservoir is a key drinking water supplier for South Devon and the colour of the water is currently an issue, caused by dissolved peat.</i></p> <p><i>All watercourses and riverine areas will be management sensitivity during operations to protect and enhance water and soil quality.</i></p>



Historic England/DNPA	On Page 7 “meeting objectives” & Page 8 “opportunity” - we ask if consideration be given to adding a HISTORIC ENVIRONMENT focussed paragraph / bullet point outlining the intention to keep SAMS and important non-designated sites free of trees and scrub and clear those still under cover in order to improve the sites condition and landscape setting.	<p>“Meeting Objectives” page acknowledges the importance of the ‘Historic Environment’ and makes a key pledge to ‘Create, link and maintain areas as open around significant and scheduled features’.</p> <p>Page 8 – “Opportunity” is copied verbatim from the NE NCA document. To change the wording is to change NE’s stance</p>
Dartmoor Forest CP	No Response	-
Manaton CP (Soussons)	No Response	-
Chagford CP	No Response	-
NGOs		
RSPB	<p>Objectives</p> <p>‘Protect and enhance woodland and open habitats and their associated species’. We welcome this nature objective, however, how the objective will be met is very vague. It also remains concerning that, other than a mention on page 29, the plan doesn’t recognise the significance of its nightjar population in the objectives and design proposals. Fernworthy, Soussons and Bellever between them supported c.1.5% of the national nightjar population in the last national nightjar survey in 2004, exceeding by some way the threshold for qualifying as a Special Protection Area under the EU Wild Birds Directive. It is furthermore the most westerly nationally important nightjar population in England and as such is critical to maintaining the species’ range. Nightjars have specific requirements for breeding and foraging sites, and securing their future in the forests will necessitate specific silvicultural approaches across the forests. This doesn’t appear to be recognised within the objectives or the analysis and concept plans to show how future management will conserve and enhance them. It is also not clear from the plan if there will be no net loss of existing habitat as a minimum.</p> <p>‘The diversification of woodland species and structure for greater ecological and economic resilience’. It is not clear how this will deliver ecological resilience, especially when planting ‘novel’ species. The plan states that meeting this objective involves CCF. We have specific concerns here over the provisions for nightjars, as commented above. This also relates to the CFF section on page 20.</p> <p>‘The delivery of well designed proposals in keeping with the National Park Character’. We welcome the softening of the plantation edges but would like to see this happen around much of the plantation edges rather than just in the few locations identified, which are driven purely by landscape. Allowing the development of native scrub and scattered trees around much of the edge will provide ecological as well as landscape enhancements.</p> <p>Landscape character</p> <p>The plan makes reference to the NCA ‘opportunity’: ‘Planning for the long term restructuring of conifer plantations on the open moor, softening hard visual edges and undertaking a phased removal programme and reversion to heather moorland’. We support this statement. However, the FDP proposes felling some conifers around some edges but then up to 50% replanting with conifers in this transition zone to create a ‘softened/feathered edge’. In our view, it would be more appropriate to have a zone of natural regeneration (some native scrub and trees).</p> <p>Plan concepts (where not covered above)</p> <p>There are still proposals to remove some areas of “unsuitable open space” that is scrubbing over. We question why this is considered unsuitable and why it cannot be maintained as open space, or open space with some scrub?</p> <p>Our concerns remain regarding statements on compensatory planting on open areas that are scrubbing up (in return for open ground creation by removal of conifers elsewhere). Our previous comments on this still stand.</p> <p>For riparian zones the plan states “The target will be to reach a maximum of 50% forest cover of site appropriate wet woodland species”. Under UKWAS, all plantations should remove conifers within 10-20 metres of forest tracks and streams, but it is not clear in the plan that this will be the case.</p> <p>Resilience (p17). Good to see aspen and rowan included in the list of potential species.</p>	<p>The Plan now acknowledges this on Designations page 9</p> <p><i>Although not designated Fernworthy, Soussons and Bellever between them support c.1.5% of the national nightjar population, exceeding by some way the threshold for qualifying as a Special Protection Area under the EU Wild Birds Directive.</i></p> <p>A mix of silvicultural approaches delivering a varied forest structure will increase resilience in spruce dominated block. Clearfell – and therefore nightjar habitat creation – remains the main form of woodland management, used across 751 ha of the Plan area.</p> <p>The delivery of transient open space for ecological benefit is prescribed on page 28. <i>The objective is to use the ride network to extend and connect with the surrounding heathland, this will be achieved through targeted widening and unstocking of edges to some coupes following felling operations to create a mixed transient open and diffuse scrubby habitat.</i></p> <p>The Plan states on page 18, <i>the area may replanted by up to 50% to allow greater species and visual diversity but natural regeneration will be favoured where possible to create a natural graded edge.</i> Visual integration of high conifer forest with upland heathland requires conifer as part of the mix in the ‘transient zone’.</p> <p>Rationalisation of open space delivery to ensure the right tree is in the right place, and right open habitat is created in the right place, with no net loss on open areas is inline with FC Open Habitats Policy.</p> <p>UKFS outlines the parameters for planting conifers close to streamsides. Future restocking will adhere to this guidance. Operations on existing to crops to pull back from streamsides will be at the time of intervention through thinning and possible clearance where windprone and operationally sound</p> <p>No changes required</p>



	<p>Landscape integration (p18). The Soussons (south) photo shows a proposal to plant between the southern boundary of conifers and the road. This area is open unimproved acid grassland and therefore does have ecological value and shouldn't be planted as a landscape buffer. We understand this area had previously naturally developed into a softer edge until recent thinning and clearance of lower branches. We would therefore prefer to see removal of the edge of mature conifers to let a transition zone of natural regeneration develop within the existing forest boundary. Not only would this conserve the unimproved acid grassland, it would be better for nightjars (as well as later for red backed shrikes and other species) if these graded diffuse edges developed over several years without new planting and then were zoned for clearance on a long term rotation. Ideally all the plantation edges should be softened in this way.</p> <p>Felling and restocking (p21-25). We are not sure what is meant by 'Natural Reserve'?</p> <p>P22. Fernworthy. We are disappointed to see that our suggestion to enhance the mire on the north side of the forest hasn't been taken forward and likewise for the maintenance of the wet habitat on the west side.</p> <p>P23. Soussons. As we have commented above, this "amenity planting" proposal for the southern edge of Coupe 82375 will be planting on a narrow bit of current acid grassland habitat between plantation and road. We object to this planting of open space (and any other planting of current open spaces). We believe that "clumped planting along existing edges where open space is available and not considered an ecological priority . . . A diffuse edge of open space and tree cover, and not simply a broadleaf belt will be achieved over time" needs revision to keep all existing open space, create diffuse edges only by removing some of existing conifers at edge, not planting up open ground.</p> <p>P24. Bellever. Coupe 82798 would better be left as open ground/natural regeneration after felling as it is on the NE edge adjacent to the DWT managed farmland so an area of scrubby regeneration next to low intensity farmland would be good for red backed shrike and better overall for biodiversity than replanting with 70% conifer.</p> <p>P28. Bogs " . . . where appropriate these areas will remain open". We cannot see where it would be inappropriate to leave bogs open and therefore recommend this is amended to "these areas will remain open."</p> <p>P28. Improved grassland. These areas should be recorded as semi-improved grassland.</p> <p>P28. Upland heath. "To be managed as permanent open space with no more than 20% tree cover through mechanical cutting of regenerating tree species". We welcome this, and would like to see the area of this habitat increased overall on all plantations. We would also welcome more of this habitat at Bellever to fringe the extensive areas of acid grassland.</p> <p>Conservation – Features (p29) we recommend the intro clearly distinguishes between species of conservation concern/biodiversity priorities and non-natives; the inclusion of problem non-natives (and deer) and the need for control measures here is inappropriate mixed up with native species that are conservation priorities and should be fully encouraged. The statement that "Some flora and fauna species can have a detrimental impact on the forest and its features if their numbers are too high" needs to be clarified because it doesn't make clear this is referring to non-native species and livestock. In contrast, there are no negative aspects highlighted in the Recreation and Public Access section.</p> <p>P29 Nightjar – good to see the species highlighted, however, it should acknowledge the Dartmoor forests are of national importance, exceeding the SPA qualifying threshold.</p> <p>P29 Red-backed shrike – we welcome the definite commitment to provide habitat for this species. The scrubby mosaic nature of its habitat doesn't come across in the text and we suggest amending the second sentence to "Nesting in marginal habitat of scrub and open grassland greater than 2 ha, close . . .".</p>	<p>Ecological value of the roadside verge is disputed. The provision of nightjar and other bird species habitat is sufficient else well in Soussons. NPA Senior Ecologist agrees with the proposal in principle.</p> <p>See UKWAS.</p> <p>Open habitat creation is tested against FC Open Habitats Policy and creation at this location is currently not deemed suitable</p> <p>Ecological value of the roadside verge is disputed. The provision of nightjar and other bird species habitat is sufficient else well in Soussons. NPA Senior Ecologist agrees with the proposal in principle.</p> <p>Prescription for Coupe 82798 is outlined on page 44. <i>Coupe has strong amenity and ecological impact so planting should be clumpy with large allowance for open space to created broken edge.</i></p> <p>Wording has been changed.</p> <p>Internal Habitat Condition survey is addressing this limit in our SCDB system.</p> <p>Open space delivery far exceeds UKWAS requirements and is in keeping with the heathland dominated landscape.</p> <p>Wording now makes the distinction. <i>On the other hand some non-native flora and grazing fauna species can have a detrimental impact on the forest and its features if their numbers are too high.</i></p> <p>Wording now reflects this.</p> <p>Wording has been changed.</p>
<p>Butterfly Conservation Trust</p>	<p>No response</p>	<p>-</p>
<p>Duchy of Cornwall</p>	<p>No response</p>	<p>-</p>
<p>Devon Wildlife Trust</p>	<p>This response is mainly in consideration of the impact of Fernworthy Forest on the drinking water supply in Fernworthy Reservoir. Overall, I would like to praise the clarity of the plan, and the attempts to balance all the multiple interests. Three major issues of concern; 1) A lack of reference to the drinking water supply at Fernworthy, and the potential impact of forest management on it. The key water treatment issue is the colour of the water, caused by dissolved peat. 2) A lack of recognition that there are 4 main watercourses that flow from the forest into the reservoir. The 4th, in coupe 82406 carries as much water as the Lowton, and has the highest colour levels (dissolved peat) of the 4 streams. Management of watercourses described elsewhere in the plan, should also be applied to this stream system 3) The proposed clearfelling in coupe 82406. This area seems to contain the deepest peat, and largest areas of waterlogging within the forest. The risk of peat erosion into the reservoir is high in this compartment, both from clearfelling, and the need to put new access routes in place. It would be good to see these risks recognised in the plan.</p>	<p>Wording now acknowledges this on page 11 - <i>Fernworthy Forest is an integral component in the supply of the Fernworthy Reservoir. The Reservoir is a key drinking water supplier for South Devon and the colour of the water is currently an issue, caused by dissolved peat.</i></p> <p>and</p> <p><i>The Assycombe Brook, Lowton Brook, South Teign River and the watercourse around Thornworthy Down source in the Fernworthy catchment ... quality of the watercourses is of particular interest given the impact of dissolved peat on the coloration of the drinking water supply.</i></p> <p>Wording on page 43 now reflects the need to address this at an operational level. <i>Consult with DWT and EA prior to up-grading roading and felling operation to ensure water and soil quality is maintained.</i></p>



CONFOR	No response	-
Moor than meets the eye	No response	-
Dartmoor Pony Heritage	<p>"Thank you for sharing your proposed Dartmoor Forest Plan 2016-26 with us. I would like to respond to the points raised on behalf of the Dartmoor Pony Heritage Trust.</p> <p>The aims of the charity are very much aligned to some of the objectives of your plan and we feel that we have contributed and will continue to contribute to the objectives outlined.</p> <p>In particular, the DPHT aims to protect and preserve the Dartmoor Pony as one of the recognised emblems of Dartmoor and its value to tourism. We aim to do this by supporting the management of indigenous Dartmoor ponies and by working with all statutory / advisory bodies and the Moorland Farmers to make the Dartmoor Pony more valued and valuable.</p> <p>We will continue with our programmes to educate the general public with awareness and information of the special heritage of the Dartmoor pony and its role as part of the management of the Moor and the Bellever area in particular.</p> <p>We believe that the native Dartmoor Pony plays a vital role in conservation management as identified in your Plan and I will refer to this in more detail in this response.</p> <p>On page 8, your plan calls for the maintenance of traditional farming practises on Dartmoor. The DPHT maintains a herd of 26 Dartmoor ponies on 82 hectares of moorland leased from the Forestry Commission at Bellever. Ponies graze the site whilst they mature to a more saleable age. During the maturing process they graze the area, browsing for up to eighteen hours a day and trampling the rank grasses, which creates room and light for more sensitive plants to establish themselves.</p> <p>We are pleased to work with the FC to help to manage the land at Bellever and contribute to the accessibility, tourism, environment and local relations in the area, conjoining with the statutory obligations on the FC and its stated aims within this review document.</p> <p>Bellever undoubtedly serves as a 'flagship' for Dartmoor, providing visitors and local people alike with a remarkable mix of accessibility for leisure pursuits, diverse environments for the benefit of a broad mix of wildlife (including ponies) as well as a long term, productive forestry business. Maximising the benefits of this environment is a priority for the DPHT as much as for the FC and working together benefits all.</p> <p>Developments under MTME, jointly with FC, DPHT, DNPA and others should only increase the appeal of the Bellever, as should all partnerships. We work with the Bellever YHA, for example, taking out visitor groups and supporting each other with joint promotions that focus on the features of Bellever.</p> <p>We are aiming to work with partners to deliver a scientific project over the next 2 years that will be partly based at Bellever. The Trust has raised £5,000 to bring specialists together to gather scientific evidence to show the contribution ponies make to Dartmoor's biodiversity. We are working in partnership with new FC partners at Bellever, the Devon Wildlife Trust, with whom we have a close relationship, along with Plymouth University and the research arm of Dartmoor Zoo, and all under the guidance and support of Natural England. The project is aimed at providing data that could influence DEFRA policy nationally.</p> <p>Your plan also calls for the preservation of the archaeological sites on Dartmoor. Our Conservation Project Officer Paul Rendell leads a team of volunteers to ensure that the site remains secure, that repairs and improvements are carried out where needed and that further archaeological treasures are uncovered. The DPHT volunteer team has been responsible for the discovery, clearance and maintenance of a considerable number of important archaeological sites across Bellever, as well as boundary maintenance. To do this, hundreds of volunteer hours are worked on the site by a considerable number of individuals. Again, this meets both government and FC aims for the UK population and for the role of its valuable public access sites such as Bellever.</p> <p>Between 2011 and March this year, the following archaeological clearing has been undertaken:</p> <p>2011: Work on Bronze Age settlements (KR and KP)</p> <p>2013 - 2014: Uncovering bronze age settlement to north of Laughter Tor</p> <p>2015: Uncovering Bronze Age settlement and later building on the slopes of Laughter Tor</p> <p>Uncovering Bronze Age settlement and carrying out a survey of the</p>	No changes required



<p>Devon Wildlife Trust</p>	<p>"I make the following comments on behalf of the Devon Wildlife Trust who are responsible partners in South West Water's Upstream Thinking project.</p> <p>My specific focus is at Fernworthy Forest where the vast majority of the water that flows through and from the afforested water-shed enters Fernworthy Reservoir. Overall we very much like the approach taken by the Forestry Commission in this consultation process and that the documents provided for review are both very clear and easy to read. The details provided in the plan and associated documents are similarly very comprehensive and in the most part address the concerns that we have. However whilst we would expect that all Forestry Commission activities (and those of their subcontractors) during the duration of this plan will be in accordance with the Forestry Commission's latest best practices, especially for protecting water courses and the quality of the water within them, we have a few specific issues that we would like to raise with you.</p> <p>With regards the specific documents supplied for this consultation;</p> <p>1) No mention is made in Part 1 of any ecosystem services objective to protect water supplies in accordance with the Forestry Commission's provisioning services requirement as described in their Strategic Plan for the Public Forest Estate in England (2013).</p> <p>2) No mention is made in Part 2 (hence no analysis or concept considerations are made) of the stream systems within Fernworthy Forest coupe # 82406, as is the case for streams elsewhere, e.g. the Assycombe Brook, Lowton Brook. We would therefore like to request that the document is revised to consider all water courses that may be affected during the implementation of the Plan and that such considerations are consistently and rigorously implemented at all times to protect water quality.</p> <p>3) We have a major concern with the prescription for said coupe # 82406, specifically the 1954 Sitka Spruce and Western Hemlock plantings. Although the Forestry Commission do comment that the coupe has not been thinned, it is clear that the coupe has little established access. We would like to better understand how the actual felling and replanting activities will be conducted and hence, how any water courses and their waters will be protected, in what is clearly a very wet area. Is it possible to reflect these details within Appendix 2, Management Considerations, of this Plan thereby allowing us to review this detail?</p> <p>I make the following comment as an interested member of the public.</p> <p>4) There is mention of 'feathered-edges' on Fernworthy Forest's western fringes, of coupes #s 82337 and 82796. Will these edges be created with the existing crop or from the re-stock and hence will be created some considerable time after 2021?"</p>	<p>Meeting objectives p 7 now states <i>Protection and enhancement of water supplies and soil quality through sensitive implementation of operations and improved restocking practices.</i></p> <p>Page 39 now makes the following statement. <i>All watercourses and riverine areas will be management sensitivity during operations to protect and enhance water and soil quality.</i></p> <p>Wording on page 43 now reflects the need to address this at an operational level. <i>Waterlogged soils and deep peats necessitates consultation with DWT and EA prior to upgrading roading and felling operation to ensure water and soil quality is maintained.</i></p> <p>Plan states on page 18, <i>once felled, as transient zones, these areas will be maintained at the time of programmed operations and then first economic opportunity and therefore may become up to 100% forested at times.</i></p>
<p>Member of the public</p>	<p>I would like to see a commitment to replant/regenerate much larger areas of native broadleaves within the forests. A small example would be to replant the area of 'non-native broadleaves' in the southern part of Brimpts (due for felling 2027-2031) with native broadleaves, rather than evergreen conifers. If the current area of native broadleaves is about 2% surely you could consider doubling this by 2026 and aiming for approximately 10% by 2046. Your pie charts on pages 26 and 27 appear to show the current percentages of cover rather than the cover in 2026 and 2046; it would be helpful if they reflected the projected cover in the relevant years. The maps show a decrease in native broadleaf cover between the present and 2026, and a further decrease at Fernworthy by 2046. I also noticed a few typos ... perhaps you need someone to</p>	<p>Mistakes acknowledged</p> <p>Planting of 15 ha of 265ha over Plan period with broadleaves makes up over 5% of restocking and therefore meets with UKWAS. This in turn will lead to a overall 1% increase in 10 years and 3% in 30 years.</p>
<p>Member of the public</p>	<p>Would like to see more broad leaf woodland as part of the mix</p>	<p>Mistakes acknowledged</p> <p>Planting of 15 ha of 265ha over Plan period with broadleaves makes up over 5% of restocking and therefore meets with UKWAS. This in turn will lead to a overall 1% increase in 10 years and 3% in 30 years.</p>



Consultee Name	Consultee Comment	FC Response
Dartmoor Society	<p>The Dartmoor Society was unaware of the Dartmoor Forest Plan until recently. We understand that opportunity for consultation on the plan has been extended to 25 July 2016, and our comments are given below.</p> <p>1. Historic Environment and Cultural Heritage</p> <p>We consider that the planting of commercial coniferous plantations on Dartmoor in the 20th century was hugely damaging to the cultural environment, which at the time was not fully appreciated, but we very much welcome the Objective 'To conserve, maintain and enhance cultural and heritage assets, their setting and the historical environment'. We also very much appreciate efforts that have been made in recent years to clear trees from certain identified archaeological sites. However, there has been a bias towards prehistoric sites and, with the exception of certain sites within Fernworthy Forest, those features of the medieval and post-medieval period have been relatively ignored and are still relatively poorly understood. In particular, sites relating to tinworking such as streamworks and leats, need to be included in the overview of cultural assets within the Forests. Most of the streams within the afforested areas contain evidence of medieval and later tin streamworks, and there needs to be a policy, where possible, of opening up these stream-edge sites so that this important part of Dartmoor's cultural heritage can be better appreciated and understood. An example is the stream in Soussons Forest extending westwards from the Redwater valley and centred at SX 683800. This area has recently been clearfelled and has exposed an extensive area of tin streamworks. It would be highly desirable to keep these streamworks clear of trees in the future and we recommend that this should become policy. Many other streams need to be explored and assessed for the same reasons. In Fernworthy Forest we recommend that the route of medieval Southill Leat where it passes through the Forest should also be cleared (see Newman 2013 <i>The Archaeology of Fernworthy Forest, Dartmoor, Devon</i>, 4.2, p.60 + Fig.2), and also the courses of the Birch Tor & Vitifer leats (Newman, Fig.2). Analysis of LiDAR should be of great help in recording features.</p> <p>Regarding Fernworthy Stone Circle (Froggy mead) we recommend that trees are cleared on its northern/north-western side to create a vista towards open moorland.</p> <p>We recommend that archaeological and historical studies, equivalent to those carried out by Phil Newman at Fernworthy in 2013, should be commissioned for each of the other Forest areas.</p> <p>We recommend that an oral history project should be initiated to record memories of past Forestry Commission activity on Dartmoor.</p> <p>2. Clearance of 'escapee' trees</p> <p>We are concerned about the considerable number of coniferous self-seeded trees that have escaped the confines of the Forests and which are steadily colonising open moorland in the vicinity. In particular, those spreading southwards from Bellever Forest onto the slopes of Laughter Tor are specially noticeable, but they exist elsewhere too (e.g. N of Soussons Forest). We recommend that there should be a policy of clearance of such trees before dense non-indigenous woodland becomes established on what was once open moorland.</p> <p>3. Visual impact of trees</p> <p>We would support any move to clear trees from the highest points of Fernworthy Forest (White Ridge etc) so that no skyline of coniferous plantation is visible when looking northwards from the Postbridge area and elsewhere on Dartmoor.</p> <p>4. The Dartmoor Society will be very pleased to assist the Forestry Commission in future, to achieve these proposals in whatever way possible.</p>	<p>The following response was sent to all consultees via Forest Services :</p> <p>In the view of Forest Enterprise, the Dartmoor Forest Plan presents sustainable management proposals for the forests of Dartmoor that balance the needs of natural & cultural heritage, local stakeholders & visitors to the public forest estate & the business needs of the organisation & the local economy.</p> <p>The comments received during the Public Register consultation process focussed on three main areas.</p> <p><u>Consultation</u></p> <p>West England Forest District conducts all of its Forest Plan consultations online via Citizen Space in accordance with government aims to expand the use of digital technology. We contacted organisations that are statutory planning consultees and those groups and individuals which are partners on our estate including neighbours and tenants. In addition we advertised the consultation widely on the Estate at major access points. In total the consultation webpage received 80 unique visitors and 120 total page views over the course of 28 days. We are satisfied that our consultation was sufficient in length and breadth. We accept the comments that the consultation process could have been more widely advertised and are looking at ways that this could be improved in future Forest Plan consultations.</p> <p><u>Ecological provision (incl. the expansion of native broadleaf cover)</u></p> <p>The Plan makes a commitment to increase the area of broadleaf restocking by 15ha across 230ha of sites felled between 2016-2026 (a 6% increase during this period). This is focussed on wetter, richer valley bottoms where contiguous areas of broadleaf are likely to thrive, rather than creating isolated broadleaved patches as part of large exposed conifer restocking sites. The Plan also states on pages 22-25 'Whilst 'Restock Proportion' is often prescribed at 100% Evergreen Conifer the use of suitable broadleaves to build in resilience and utilise site conditions is anticipated and in places is proposed'. In addition, unstocked feathered edges at Fernworthy will deliver an additional 16ha of transient open space/broadleaf habitat between 2016-26 – this has also has not been included in the Indicative Future Species figures on pages 26 and 27. In total, and with an additional 5ha of permanent open space creation, there will be a reduction of at least 36ha of conifer area between 2016-2026 (a 15% decrease during this period).</p> <p>We acknowledge that the Plan should better highlight the corridor work that will be undertaken as part of the Design and Management of Environmental Corridors quoted on page 28. The objective is to use the ride & riparian habitat network to extend and connect with the surrounding heathland. This will be achieved through targeted widening and tree removal from the edges of some coupes following felling operations to create a mixed transient open and diffuse scrubby habitat. Where appropriate, following felling and cleaning operations, opportunities will be taken to extend and buffer the priority habitats. This will be realised when we come to thin wind stable crops or at the time of clearfell, corridors will be widened to create diverse and valuable linkages. This point is also covered on page 39 with regard to stream sides: All felling and restocking operations will work within the guidelines set out in UKFS, Forests and Water with the aim of developing further riparian areas at the time of intervention through heavier thinning of conifer and stimulating native species regeneration.</p> <p>The Plan will be updated to highlight where work will be focussed in the coming ten years.</p> <p><u>Historic landscape</u></p> <p>The Plan makes some provision for improving the condition and context of the historic features and landscape in which they sit. The opening up of historical streamworks either at the time of thinning or by not restocking areas after felling is covered on page 39, as referenced above. We will look to clear the Southill Birch Tor and Vitifer Leat at the time of next intervention, assuming the crop is windstable enough to withstand the exposure. Previous restoration work carried forward and built on in this Plan demonstrate our commitment to improve the setting of the archaeological and heritage features found on Dartmoor.</p>
Dartmoor Preservation Association	<p>I am writing to express our concern at the way in which the "consultation" on the Dartmoor Forest Plan 2016-2026 has been handled and would make the following points:</p> <p>1. I question why the Forestry Commission decided not to involve the Dartmoor Preservation Association (DPA) in the consultation? The DPA has worked with the FC for many years and I am astonished and disappointed that you did not invite us to comment.</p> <p>2. The initial consultation period was far too short for a matter of this importance. Expecting a comprehensive set of responses to a consultation which ran for less than a month is absurd.</p> <p>3. The way in which the consultation has been managed is mystifying. It now appears, anecdotally, that despite it being closed, you were prepared to accept further comments until the 25th July, or possibly the 19th. In either case, it has not proved possible to submit them on your website and, since the plan appears to have been formally submitted for approval on 21st April, what would be the point?</p> <p>4. Having only just become aware of your consultation, and not knowing whether you are still accepting comments, it is impossible to submit a detailed response. Therefore I would simply like to state our policy towards forestry on Dartmoor, as follows: "The DPA supports the return to natural broad-leaved woodlands, or to open moorland, of those forests created as soft wood cash crops and is opposed to further development of soft wood forests." We appear to be the only organisation which is challenging the whole concept of re-planting conifers at all. Is this, perhaps, the reason why we were not consulted?</p> <p>The way in which this consultation was managed is extremely unsatisfactory and the resultant Plan is therefore flawed. I would urge you to re-set the consultation process, allowing a reasonable response time and engaging with organisations such as ourselves which have a long history of conserving the Dartmoor landscape.</p>	<p>The Plan will be updated to highlight where work will be focussed in the coming ten years.</p> <p><u>Historic landscape</u></p> <p>The Plan makes some provision for improving the condition and context of the historic features and landscape in which they sit. The opening up of historical streamworks either at the time of thinning or by not restocking areas after felling is covered on page 39, as referenced above. We will look to clear the Southill Birch Tor and Vitifer Leat at the time of next intervention, assuming the crop is windstable enough to withstand the exposure. Previous restoration work carried forward and built on in this Plan demonstrate our commitment to improve the setting of the archaeological and heritage features found on Dartmoor.</p>



<p>Devon Wildlife Trust</p>	<p>Devon Wildlife Trust has previously commented on the first iteration of the Dartmoor Forest Plan and welcomed the majority of the proposals associated with benefits to the water resource and water quality environment at Fernworthy. I'm afraid we were unable to provide wider comment on the design principles that have been incorporated in the plan at that stage and I welcome the opportunity to now make some wider observations.</p> <p>The plantations which are in scope have strong ecological association with nationally and internationally designated habitats including the Dartmoor SAC. As such they should be managed to enhance the protected features through increasing the extent of habitat available and permeability to species moving through the landscape.</p> <p>The forests support an abundance of section 41 habitats and species. The nightjar population is particularly noteworthy, as RSPB note this is a qualifying feature for SPA designation. In addition, mire, acid grasslands, wet woodlands, upland oak woodland, upland heath, fen meadow etc are supported. We recognise the impressive work that has been carried out to maintain existing habitat and species populations.</p> <p>It is however concerning that specific habitats and species have been identified but the plan lacks ambition and clear targets to significantly enhance these wildlife rich features. A number of respondents have raised these common concerns however little change to the plan has occurred.</p> <p>For example:</p> <p>We welcome the prescription to soften edges but these represent a small proportion of the total length and appear to have been prioritised for landscape impact mitigation as opposed to adopting a holistic approach that recognises the biodiversity benefits. The 'hard edge' to the south of Sousons is a prime example where semi-natural acid grasslands are to be lost where instead these should be retained (and well managed) and the soft edges incorporated within the current plantation zone.</p> <p>DWT would like to see existing, highly fragmented habitats located within the forestry plantations (such as upland oakwood / wet woodland, mire and bog) substantially increased in area to secure their long term future and ecological functionality.</p> <p>DWT would like to see the extent of corridor and ride enhancement reflect the unique position these plantations hold in the ecological landscape. We recommend that a dense, diverse network of wide rides are established throughout the plantations where conditions permit.</p> <p>The Dartmoor Forest Plan provides an opportunity to take an ambitious visionary step towards securing a more diverse, healthy and productive woodland. The management, expansion and reconnection of section 41 habitats is crucial; the targeted inclusion of substantial broadleaved coupes (bordering water courses for example) to deliver a more diverse suit of public goods is something we would fully support.</p>	
<p>Woodland Trust</p>	<p>I am not sure if you can help but I was hoping to have a chat with yourself or one of your colleagues regarding the consultation for the Dartmoor Forest Plan and maybe having a meet on site ?</p>	
<p>Open Spaces Society</p>	<p>It has recently come to our attention that the Forestry Commission has been consulting about its Dartmoor Forest Plan. We deeply regret that we were not informed, despite being Britain's oldest national conservation body and the leading pressure-group concerned with the protection and management of common land and open spaces. We discovered by chance that you had extended the consultation to 25 July and therefore wish to send some brief comments, and ask that we be kept fully informed and are consulted as the plan develops.</p> <p>Replacement with broadleaves and improving the landscape The landscape impact on the national park is explained in the document. We should like to see far greater emphasis given to the replacement of conifers with native broadleaved species, especially on the edges and along the rides. The edges require particular attention to remove the landscape impact on distant and close views. Despite some replacement over the years, the forests are still a hideous blot on the landscape with their straight dark edges, and the rides through them are still monotonous for walkers and riders.</p> <p>There should be research into the broadleaves which will thrive over the next 50 years, given the changing climate, and evidence presented as to which species will fare best.</p> <p>We note the FC's response to consultees' comments which asked for a commitment to replant with broadleaves, and we consider that this is inadequate. A 1% increase in 10 years and a 3% increase in 30 years are derisory.</p> <p>Attention to ancient monuments The forestry land is rich in ancient monuments which tell Dartmoor's story throughout its long history. I recall the initiative in about 1973 when the Forestry Commission began to respect the ancient monuments and clear trees around them. This led in time to a working party involving the Dartmoor National Park Authority, Dartmoor Preservation Association and others, which aimed to free the monuments from trees. That work should continue, and perhaps the working party should be reconvened.</p> <p>Discussion about the future There should be a full and open discussion about the future of the forest estate. There is a debate to be had about the percentages of conifers to be replaced, and whether the land should be managed as open glades with regeneration of heather, or whether it should be planted with broadleaved trees.</p> <p>Access We are pleased that the FC has dedicated its estate for open access under section 16 of the Countryside and Rights of Way Act 2000. FC might like to consider whether such access should be available for horse riders too, in line with the provisions of the Dartmoor Commons Act 1985.</p>	

<p>Member of the public</p>	<p>I would like to comment on the Dartmoor Forest Plan. I live in Moretonhampstead on Dartmoor.</p> <p>I think you have an opportunity here to do something progressive.</p> <p>My suggestion would be to devote one of the sites entirely to a broadleaf plantation.</p> <p>There is a lot of interest in promoting native woodland tree species. Fingle Woods have an exciting project, an ongoing collaboration between National Trust and Woodland Trust. Perhaps some kind of collaboration between these organisations and the Forestry Commission?</p> <p>Moor Trees is another local group that could perhaps feed into some kind of initiative that would stimulate public interest.</p> <p>Threats to tree species are very much in the news now and I think that the Forestry Commission could definitely do something interesting here rather than stick to conventional thinking and conifer plantations - we have enough of them</p>	
<p>Member of the public</p>	<p>According to your website (http://www.forestry.gov.uk/forestry/bee9w8gda), the Dartmoor Forest Plan consultation closed on 1st April. However, I have been told that it is in fact open until 25th July. But according to this page https://englandconsult.forestry.gov.uk/forest-districts/dartmoor-forest-plan/, "further comments" are open until 19th July.</p> <p>Can you please urgently clarify which date is correct?</p> <p>And considering the consultation status is 'closed', and the plan has been submitted, can you also clarify what "further comments" actually means, and if/how will they be taken into account?</p>	
<p>Member of the public</p>	<p>A plea for a BOLD NEW VISION for the Dartmoor Forest Plan.</p> <p>As a Devonian and resident of Dartmoor I was appalled to learn that, as the existing conifer plantations on Dartmoor, a monotonous and sterile monoculture of Sitka Spruce, are clear felled, the FC proposes to replant with yet more conifers, albeit with a variety of conifer species and, in a few places, some Willow, Birch, Alder, Wych Elm and Sycamore.</p> <p>Our beleaguered native flora and fauna and we, the residents of and visitors to Dartmoor, do not want or need conifer plantations in Dartmoor National Park.</p> <p>I strongly urge FC to adopt a bold new vision: where there is to be replanting (and this should not take place on or near any archaeological sites), we want and need native broadleaved woodlands where our precious native flora and fauna have a chance to re-establish and thrive. We have already lost a huge percentage of our native flora and fauna in the lifetime of these conifer plantations, now there is an opportunity for FC to demonstrate to the public that they will be in the forefront (along with other environmental NGOs) in redressing this loss of biodiversity by planting native broadleaved trees.</p> <p>This approach would have multi-pronged benefits not least as a superb PR exercise for FC demonstrating their environmental credentials by creating new habitats for our native flora and fauna and nurturing a biodiverse, aesthetically pleasing landscape. Additionally, improving water quality by reduction of acidity both for drinking water and for aquatic life down-stream and flood mitigation. All this whilst continuing to provide FC with a highly valuable, sustainable crop albeit over a longer time frame.</p>	
<p>Member of the public</p>	<p>Re-plant Dartmoor with native trees!</p> <p>It is the obvious thing to do and i am sure many have given the reasons, prasad</p>	