## **Consultation Record**

## Citizen Space Consultation 22nd June to 30th July 2017



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Consultee Name	Consultee Comment	FC Response
STATUTORY		
Devon CC	No Response	-
Natural England Response No.1	<ol> <li>Under the SSSI Conservation Aims and Objectives (Part 4, page 28):-</li> <li>You should acknowledge that there is a difference between the notified features of the SSSI and the features that remain. Besides the assemblage of breeding raptors, the SSSI also notifies breeding Honey-buzzard and Goshawk individually. Honey buzzard no longer breeds within Haldon Forest but we could claim that the SSSI is still in favourable condition if the habitat is still suitable. Hopefully you might have received feedback from other sources on this species.</li> <li>You've covered the butterfly issue elsewhere in the documentation but might be worth repeating in this section that the notification was for 3 butterfly species individually: Pearl-bordered, small pearl bordered and wood white (the latter no longer present). Having discussed wood white with Butterfly Conservation I don't think the site is being managed for them so we're not really holding out a hope of their return, the suspicion is that they might only have flown through Haldon Forest and might never have been breeding there in recent times or in significant numbers. Hopefully you've received feedback from other sources on that species too.</li> <li>The objective is slightly contradictory – I think we only want to maintain the condition of favourable SSSI units whilst improving the condition of recovering or unfavourable units.</li> <li>The aim to 'maintain the extent of conifer forest' could be confusing – I think you mean where it supports notified features – but won't the extent be reduced in favour of broadleaves and lowland heath over time?</li> <li>SSSI aims and objectives states to 'maintain area of lowland heathland' – I thought that the area would be increased?</li> <li>I don't understand the comment about scrub cover. If ?77ha is to be managed as lowland heath we should be aiming for less than 15% scrub cover generally with some edge areas up to 25% cover.</li> <li>SSSI analysis and concept: Unit 105: It's not clear</li></ol>	<ol> <li>Wording has been changed to reflect this on page 28: The designated species are raptor assemblage, goshawk, honey buzzard (no longer present), nightjar, pearl-bordered fritillary, small pearl-bordered fritillary and wood white (no longer present).</li> <li>Wording has been changed to reflect this on page 28: The designated species are raptor assemblage, goshawk, honey buzzard (no longer present), nightjar, pearl-bordered fritillary, small pearl-bordered fritillary and wood white (no longer present).</li> <li>Wording of objective has been changed to reflect this on page 28: Maintain the designated favourable units in their current condition and carry out any necessary management practices as required by Natural England to move the unfavourable SSSI units into favourable condition.</li> <li>Wording of aim has been changed to reflect this on page 28: Maintain the extent of mixed coniferous and broadleaved woodland ensuring a continuous supply of clearfell, early rotational and long-term retention conifer habitat is available for notified species<sup>1</sup>. The increased provision for lowland heathland does not contribute to the overall objective of the SSSI and will not affect the condition assessment — unless it leads to a loss in raptor numbers. The increased provision of heathland is as a result of justification for forestry against Policy and finding a balance in the landscape which then contributes to ecology.</li> <li>How do we define 'edge' and according to favourable conservation tables up to 20% is acceptable, including edges, . Wording of aim has been changed to clarify this and allow more dynamic approach, on page 28: Maintain the extent of lowland heathland/ grassland (77ha) with an understanding that fluctuations in levels of scrub up to 20% cover are acceptable.</li> <li>Retention of trees (including appropriate conifer i.e. pine) beyond economic maturity, provides ecosystem services for a multitude of species to flourish, both on the edge (e.g. nightjar) and under the canop</li></ol>

Consultee Name	Consultee Comment	FC Response
	8. P31: The butterflies mentioned in the first paragraph do not depend on the coniferous woodland but on open space within it. I think it's the open space habitat of bracken combined with larval food plants, including violet spp that provide for the butterflies and which are essential. The adjacent conifers provide only shelter to allow the butterfly rides to warm up.	8. Reference to butterflies has been removed.
	9. Raptor and nightjar monitoring – As I understand it the FC is under some planning obligation to monitor in mitigation for the original development of the recreational hub. Could you state what is required within your plan? (Need to check the 'every 5 year' standard mentioned under nightjar).	9. Aim of the SSSI on page 28 is to Monitor the abundance and presence of notified species. Reference to 5 years has been removed. This is inline with planning condition 2004 of Monitoring of SSSI features is to be an integral part of the access plan, particularly ground nesting birds and raptors.
	10. Butterflies: There's a useful map that also identifies roads and rides, but I'm having difficultly connecting this with the management proposals – is it intended to improved management of rides and roadsides? I think you get to this in Part 6 – Conservation – Ride Sides and Habitat (does this belong in Part 6?). Could you provide a timescale for delivery of the mapped vision at Part 6?	10. Wording updated and clarified to connect with Page 63. Habitat improvement works are now stipulated to occur over the coming Plan period.
	11. Future open habitat management: Some areas of heath look very fragmented, particularly the pink in the NW corner that appears to be pock-marked with white. I see this is where we get to the summary proposal – 35ha of new heathland and 99ha of 'wooded heath'. I'd like to see a	11. The areas illustrated reflect a minimal viable patch heathland size of 15ha within 20ha and is in line with Policy. Unit 105 has been updated accordingly.
	firmer presumption for the wooded heath to be restored to heathland where-ever possible. On the area adjacent to Ideford common I can see no reason for the remaining woodland pockets to be identified as wooded heath. A management regime (HLS+ grazing etc) is already in place to restore the adjacent heath that could easily be extended to cover the adjacent land. The presumption as the document stands is for these areas to end up as successional scrub and the	Comment regarding Ideford acknowledged this has now been changed to future lowland heathland for areas within grazing unit (1.5ha) - area north of the road remains wooded heath — otherwise all current grazing units are to be reverted to lowland heathland using grazing and cutting.
Natural England Response No.1 Continued	full restoration of heath to be the exception. I suspect that following the regeneration of successional scrub (probably including large European gorse and medium birch trees, that it might actually become harder to restore the areas to lowland heath than it is now.  Appendix 5:	Firmer favouring towards lowland heathland over wooded heath has been made. On page 37 It is an aspiration that all of the heathland restoration of 136ha will be lowland heathland standards. If an external party or funding opportunity takes on the responsibility of wooded heath sites then more intensive open habitat maintenance can be implemented.
	12. For chemical applications to planted areas you state that: 'Checks for breeding birds should take place before works commence'. However, for mechanical control you state that: 'Checks for known breeding bird records should take place before works commence'. This suggests that the site is physically surveyed for chemical applications but that just a desk exercise would take place for mechanical works. Shouldn't a site survey be done for the mechanical weeding too?	12. Wording changed to clarify the situation. Checks will not be made prior to chemical spray however, as with mechanical cutting, operators will remain vigilant and will observe a 20m buffer if a ground nest is discovered.
	13. For road/ride etc flailing you have restricted hedge trimming to: 'between March and mid-August'. Natural England's standards for hedges on farms usually exclude 1 March to 31	13. Wording changed to reflect this on page 117 to: No hedge cutting to be undertaken between 1st March and 31st August.
	August. (Exemptions exist for tracks requiring regular vehicular access).	14. The Regulations have now been referenced on page 120, EA license is not required.
regulations should be followed, these are published on GOV.UK at: https://www.gov.guidance/heather-and-grass-burning  15. Scraping topsoil: This can be over-done. I would prefer to describe it as: scraping/conscient accumulated leaf/needle litter. Natural England's standard description used to read (more flexible now): 'Remove the litter where it is greater than 5cm, but ensure that of the mineral soil receives minimal damage. Where the litter is less than 5cm, disturbated and the seed bank'. I would only advocate deeper scrape.	regulations should be followed, these are published on GOV.UK at: https://www.gov.uk/	15. Wording has been changed to reflect this on page 120: Remove the litter up to 10cm using an 360 excavator to remove nutrients and allow for restoration of dwarf shrub heathland, but ensure that the surface of the mineral soil receives minimal damage.
	accumulated leaf/needle litter. Natural England's standard description used to read (it's become	Where the litter is less than 5cm, disturb the litter layer to stimulate germination of the seed bank
	of the mineral soil receives minimal damage. Where the litter is less than 5cm, disturb the litter layer to stimulate germination of the seed bank'. I would only advocate deeper scraping (than	In well-established heath bare ground can be created where otherwise no bare ground would otherwise be present.
	the standard guidance suggests) in well-established heath to create bare ground where otherwise no bare ground would otherwise be present.	Arisings will be removed and carefully landscaped to ensure they provide habitat for a range of invertebrates and reptiles and are visually acceptable.

Consultee Name	Consultee Comment	FC Response
	My consultation response below is largely restricted to potential impacts/considerations relating to Stover Park SSSI and Great Plantation. As requested, I've also provided some outline comments on other ecological aspects but I stress this is not my area of work so further consultation with qualified ecologists is recommended around the matter of protected species, if not already undertaken. Bearing in mind the document FCRN016 it might be worth considering some/all of the following points in relation to Stover Park SSSI and felling/restocking proposals within Great Plantation:	
	1. Is an assessment of critical loads within Great Plantation needed to assess whether the watercourse is at risk of acidification? Being immediately adjacent to the Stover Park SSSI, this is most likely to be deemed a sensitive watercourse. There are also pollutant sources close to this location (primarily the busy A38, A382 roads and Drumbridges junction together with Heathfield Industrial Estate). Results from WRT's WQ monitoring may assist in providing evidence as to whether acidification is currently evident in the watercourses and potentially impacting on the SSSI features or indeed whether felling operations may result in an acceleration of acidifying effect on the watercourse. We will ensure any WQ data is shared with you at the earliest opportunity.	1. WRTs WQ monitoring should incorporate any necessary critical load assessment
	2. Restocking plans should consider future acidification risks. Mitigation could include using a greater proportion of broad-leafed species than currently proposed (particularly within coupe 81978), include provision for a good proportion of open glades/reduce areas of closed canopies so as to avoid soils drying out and excessive tree litter building up. FCRN016 suggests it might also be appropriate to limit Alder re-planting to 10% due to associated risks of nitrate leaching but overall it would seem sensible to include willow and alder and other broad-leaved species within coupe 81978 in preference to conifer as this site is know to be wet.	2. Restocking for 81978 includes at least 30% broadleaved cover, with prescription outlined on page 79 as follows: Replanting should focus along the drier westerly parts of the coupe. Ample space should be provided to widen corridors. Restocking in the extreme wet parts should focus around willow and birch regeneration and enrichment with suitable broadleaves, (i.e. alder and aspen) elsewhere consider Macedonian pine, Sitka spruce, Western red cedar or Pedunculate oak.
Natural England Response No.2	3. During and immediately following felling operations, it would be useful if consideration could be given to avoiding/repairing any soil compaction, particularly within coupe 81978 to reduce the risk of nutrient leaching. Leaving undisturbed buffers immediately adjacent to water courses within Great Plantation would be very useful.	The Plan also makes the following statement throughout Whilst 'Restock Proportion' is often prescribed at 100% Evergreen (Ev.) Conifer the use of suitable broadleaves to build in resilience and utilise site conditions is anticipated and in places is proposed.
	4. I would stress that at this stage, there is little water chemistry data to suggest acidification from the Great Plantation is directly impacting on SSSI features within Stover Park although tree litter and debris from plantations within Stover are definitely contributing to poor water quality as demonstrated by recent analysis of lake sediments by RHDHV. As stated, we will hopefully know more once the WRT data is available (early 2018).	3. UKFS Forest and Water Guidelines will be followed, in particular around protection buffers to avoid leaching and compaction. The details of how this carried out will be stipulated in the Operational Plan prior to operation
	With regards to protected species, I would make the following comments but please take further	4. No response
	<ul> <li>advice as needed.</li> <li>5. Dormice – I believe there are already records of dormice present at Stover. Great Plantation may well have additional populations so I'd imagine appropriate survey and mitigation may be needed prior to felling operations commencing. Any works may need to be covered by an EPS licence.</li> </ul>	5. Management and operations within favourable dormouse habitat will follow standard FC procedures and guidance. The details of how this carried out will be stipulated in the Operational Plan prior to operation.
	6. Reptiles – Again, there are records of slow worm, adder and grass snake at Stover Park. If this is the case for Great Plantation too, the protection needed for these is slightly lower but still requires consideration. I don't think this needs to be covered by EPS licence, but I would imagine a detailed methodology will need to show how you intend to avoid death of reptile species.	6. Management and operations within areas favourable to reptile habitat, i.e. the scrapes within the centre of the plantation will follow standard FC procedures and guidance. The details of how this carried out will be stipulated in the Operational Plan prior to operation.
	7. Bats – Consider risk of disturbance to roosting bats in the proposed clear fell areas via ecological survey (EPS licence may then be needed if risk is deemed high). Great Plantation is also with the Greater Horseshoe bat sustenance zone with adjacent flightpaths recorded. Again, I would imagine bat survey at the right time of year will be needed to determine the level of GH Bat activity within the Great Plantation before finalising your felling plans. Again, an EPS licence may be needed.	7. FC Guidance and procedure will be followed prior to operations to ensure bats are not disturbed. See Appendix 8 for specific Habitats Regulations Assessment for South Hams SAC within 4km of management proposals. This considers the impact of the Plan on the SAC and its features.

Consultee Name	Consultee Comment	FC Response
Environment Agency	No Response	-
Historic England	No Response	-
Teignbridge Council	No Response	-
Ashcombe CP	No Response	-
Ashton CP	<ol> <li>Thankyou for the emailed copy of your plan, which I have circulated to the residents of Ashton.</li> <li>You may not be surprised to know that people in this parish take a considerable interest in what is happening in your domain. Much of what is mentioned at our meetings is very positive. However, there remains an ongoing concern about traffic along the ridge road. Despite earlier efforts to prevent casual road-side parking, there are often numerous cars parked, thus restricting the passage of other, particularly agricultural, vehicles. Concern is also expressed about the potential for parked cars to prevent access by emergency vehicles. The large stones and raised verges are definitely effective. We would encourage you to apply that strategy to the whole length of the road. As an occasional visitor myself, I would observe that the designated car parking area is already under pressure at peak times, and want to stress that any further leisure development must be accompanied by an expansion of the facility.</li> <li>Finally, if you can find a spare hard copy of your document, I would be grateful to have one.</li> </ol>	<ol> <li>Comment acknowledged. These comments have been passed to the Recreation and Estates team to be addressed as part of an ongoing programme to overcome issues around 'unauthorised parking'.</li> <li>Contact will be made once the Plan has been approved by Forest Services to facilitate a delivery of hard copy being passed to the respondent.</li> </ol>
Bishopsteignton CP	1. Having read the consultation document and discussed the matter in council the only thoughts that were bought forward are - the Archaeological remains that are to be found across Haldon ranging from Anglo Saxon to late Romano British must be preserved for the future enlightenment and education of future generations. We hope that when ground works are undertaken that your operators ensure these remain in situ.	1. Acknowledged and covered on page 66. Wording now changed to: Numerous other heritage features, including boundary stones and crop marks, are within the Plan area and are recorded within the Historic Environment Record. This database, and where appropriate experts, will be consulted before operations take place to ensure features are preserved for the future enlightenment and education and enhanced though management.
Dunchideock CP	<ol> <li>Introduction: The Management Plan for Haldon Forest has come up for renewal and the Forestry Commission have initiated a public consultation prior to finalizing the updated plan.         Dunchideock parish borders the main forest area at Bullers Hill and many residents within Dunchideock village actively use the site for recreation; a number of our residents have expressed concern that the forest itself (and the wider road network) is under increasing pressure as a result of growing popularity for recreation of various types. Accordingly, we have listed a number of important points that we urge the Forestry Commission to carefully consider during their review of the management plan.     </li> <li>Ecology: The site is a Site of Special Scientific Interest and as such has a very high degree of ecological interest, much of which is highly sensitive to the visitor activities being actively promoted and expanded in Zones 1-3. For example, there are proposals in the management plan to exclude mountain biking (events but presumably not general riding) from areas around known rare bird nest sites. This assumes that the locations of such nest sites are accurately known and the biking can be controlled. As a full picture of the pattern of nightjar nesting is unlikely (it is a difficult species to survey for) a better and more sustainable approach in keeping with the SSSI status of the site would be to promote such activities outside the nesting season (i.e. outside May to August inclusive) in the wider areas where such sensitive species are known to nest (this would give walkers and quieter visitors a little respite also during these months). Nightjar, as well as a number of other breeding bird species at Haldon, are listed on Schedule 1 of the Wildlife and Countryside Act and such birds are, whilst nesting, legally protected from disturbance. This level of protection demands a precautionary approach with respect to cycling and should necessitate firmer controls over dog-walking; both activities m</li></ol>	<ol> <li>Regular surveys and up-to-date records of Schedule 1 birds (nightjar is not a Schedule 1 protected bird) are completed as part of operational planning and ecological surveying, including nightjar surveys in 2016 and 2017. The FC has a good handle on sites which are well used by specific protected species.</li> <li>Robust protection of these species is to continue through exclusion and restriction of dogs, and clear routing of cycle trails.</li> <li>With particular reference to recreation trails and events, as stipulated on page 116 Any new trails will be subject of discussion between FC and NE at the planning stage and Any events planned for within the bird breeding season will be assessed for their likelihood of disturbance and re-routed if necessary. Natural England, the statutory authority assent to this approach.</li> </ol>

Consultee Name	Consultee Comment	FC Response
	2. In the midst of the SSSI is Bullers Hill Quarry, surrounded by SSSI units 108, 109 & 110 (page 27). Yet this doesn't appear to be mentioned in the plan. Since this quarry has ceased production and as part of its minerals planning consent requires restoration to its former condition, should it not be considered as an integral part of the proposals, even if this is only to ensure that any redevelopment of this area of land is commensurate with the ecology and context of the Haldon Forest?	2. Bullers Hill Quarry is referenced in passing on pages 8, 19 before being acknowledged as a SSSI on page 34 and management outlined on pages 109-111.
	3. Increase in noise and visual disturbance: Fifteen or so years ago, Haldon was used in a fairly limited way for recreation; principally by locals for walking and other quiet recreational pursuits which appeared to be in keeping with and appreciative of a forest environment.	3. No response
	4. Whilst development as a country park has resulted in a lessening of a former antisocial problem (of which the police are aware but have been able to do little), the construction of significant recreational infrastructure at the Forest Hub including car parks, cycle trails, a café, studio and music area, and introduction of group activities such as Segway, means that visitor numbers have increased dramatically in recent years - in the opinion of Dunchideock Parish Council (DPC) to the point where the visitor experience is no longer one of quiet recreation. The tranquil space normally associated with woodland and heathland has now gone in Zone 1 and is under threat in surrounding areas; indeed the noise associated with Forest Hub events such as music and cinema can be heard from several kilometres away and has been periodically commented upon by local residents in Dunchideock.	4. Comment passed to the Recreation team.
Dunchideock CP continued	5. The scale of any concert / cinema facilities is worrying. These may lead to significant conflict with the need for large numbers of attendees to come and go at around the same time. The current parking problems and attendant road congestion would hardly suggest this is a realistic enterprise in this locality which is dominated by small Devon lanes. The impacts of such events locally (WestPoint, Powderham, Knighthayes) all should inform of this potentially unsuitable enterprise.	5. Any entertainment events are rare (i.e. no more that once a month) and small in size (i.e. no more than 100 people)
	6. Cycling: The site is has for a number of years been actively promoted as a high quality mountain biking destination and visitors appear to be coming from some distance to ride here, on purpose-made forest tracks but also on neighbouring roads. However, there appears to be a growing conflict between walkers and mountain bikers - in particular between cyclists and walkers with dogs (the Haldon Forest Facebook page bears testimony to this) and this should be a concern for the FC as it is highly likely that there is potential for a serious accident to occur. Such conflict further diminishes the visitor experience for walkers and others seeking to enjoy quiet recreation pursuits. Clearer signs / wider trails / clear routing of bikes away from walking trails / imposing exclusion times for cycling would all help to reduce conflict and would also allow quiet reflective time for walkers, as would routing biking routes though outer areas with no previous history of quiet recreation and that are well away from roads. Designated cycle crossing points on the public roads are currently a hazard – these need more attention to discourage mountain bikers from leaping unfettered across the road. We note that the hours of darkness are now no longer a deterrent to riders, as the new types of powerful LED lighting now enables riding 24 hours a day. Further, we feel night riding could increasingly compromise the ecological integrity of the site as well as providing further visual disturbance and possible increasing conflict with road traffic (see below).	<ol> <li>Cyclists are actively encouraged to remain within the Bullers Hill, Tower Wood and Kiddens areas. This leaves the remainder of the Plan area including Harcombe, Dawlish Waterworks, Mamhead and Ideford free of cycles.</li> <li>Comment passed to the Recreation team.</li> </ol>

Consultee Name	Consultee Comment	FC Response
	7. Traffic: During the past year the amount of on-road parking along Bullers Hill appears to have increased dramatically; it is a concern being increasingly brought to DPC meetings. We acknowledge that in the past the FC has built roadside 'bunds' along Bullers Hill to deter parking, but cars have simply ignored these and during the past year or two bunds have become badly eroded by high levels of traffic parking. This countryside locality cannot introduce formal parking restrictions so better designed, more effective, roadside bunding must be constructed. It cannot be safe to extract / load children and/or dogs on what can be quite a fast road, along which one DPC member recently counted 15 cars parked on the road on a weekend; it is much worse on bank holidays, and queuing on Bullers Hill is sometimes the result. The road has now become impassable at times when cars are parked on the road itself and there are serious concerns (from the FC as well) that emergency vehicles would not be able to pass at times. This increase in on-road parking appears to be in part associated with promotion of Zone 1 as a 'honeypot' (i.e. traffic volumes are increasing steadily in the surrounding area and through local villages) and also because of the new apparently higher parking charges reported in the main Buller's Hill car park. It appears this is dissuading some drivers from using the car park and they instead park along the road. Perhaps reducing parking fees could be offset by an increase in other income streams? For example by imposing a levy (or an increase in existing fees) on paid-for activities within the forest.	7. Comment acknowledged. These comments have been passed to the Recreation and Estates team to be addressed as part of an ongoing programme to overcome issues around 'unauthorised parking'.
Dunchideock CP continued	Pages 76/77 of the Management Plan cover fire risk. Although this sets out the forest planning for such risk, we have concerns over Devon fire-fighting facilities being able to gain access because of the aforementioned restricted road use, parking and constricted access to much of the forest.  Other traffic-related issues raised by Dunchideock residents include the increasing volume (and speed) of visitor traffic on local lanes - especially from the direction of Ide - and the ill-considered (and sometimes dangerous) behaviour of cyclists on local roads, especially during hours of darkness (see above - the latter is expected to become an increasing problem as night mountain biking increases in popularity). We appreciate this is not in the FC's control, but the proposed Management Plan may have such consequences; please take these issues into account.	
	The industrial units in Dunchideock, in particular the new major plant maintenance facility, means that heavy plant movements, and in particular, very large articulated trailers, all use Bullers Hill road. This has potential for immense conflict with parked vehicles, cyclists and pedestrians. Such lorry movements already are a cause of local concern. The Management Plan would be wise to take such notable traffic movements into account when examining the management of parked vehicles and safe road use.	
	8. Dog mess: Local residents have reported that dog mess is increasingly a real issue in many areas; this is often frequent on tracks and track edges. This is both an eyesore and a health hazard; dog bins along with some minor educational signs would go some way to alleviating this problem.	8. Owners are responsible for their own dog mess. Bins are provided in high volume areas as well as signs reminding owners to 'pick it up'.
	9. Use of other areas of Haldon Forest: The forest is large and many of the outlying areas could potentially be promoted to accommodate the quiet activities that formerly used Zone 1. Could such areas (assuming they have appropriate low levels of ecological interest) potentially be used to disperse some higher impact activities through the year or seasonally?	9. The dispersal of some low-key recreation activities to outside the Forest Park is ongoing in order to spread the load. This is part of a District-wide Recreation Strategy.

Consultee Name	Consultee Comment	FC Response
Dunchideock CP continued	<ol> <li>The black fallow deer (which are reported to be 'rare' by the FC and form the focus of wildlife viewing during the autumn rut) do not appear to be mentioned in the management plan. Dunchideock residents have reported in recent years that increasing numbers of these animals are being seen away from their former stronghold in Zone 1 and its surrounds; the reason for this is not definitively known, but it seems likely they are being dispersed as a result of the increasing use of the core forest area for recreation. There is a resultant increase in risk of road traffic collisions with deer, as well as an increased likelihood of damage to local residents' gardens.</li> <li>Quality of the maps within the consultation document: The quality of the maps and plans within the consultation documents are simple pdfs and of low quality. Consequently more than one person has indicated to us that it can be difficult to geographically orientate yourself and thus this makes sound commentary on the plan difficult.</li> <li>Conclusion: Whilst DPC recognises and welcomes the structured development of this wonderful woodland / heathland site as a focus for appropriate countryside recreation, we feel that its development should be in keeping with the forest's wooded and heathland character (which has had rather a wild feel in the past) and one that supports some very important and rare wildlife populations.</li> <li>Pages 76/77 of the Management Plan cover fire risk. Although this sets out the forest DPC is concerned that the site is becoming a victim of its own success and that the increasing visitor pressure (which is being actively promoted by the Forestry Commission) is eroding the tranquillity of the area and diminishing the wildlife and landscape resource that makes the site so attractive to the visitor. Indeed, without further checks, the area will purely be known as a mountain biking and outdoor pursuits / activity centre.</li> </ol>	<ul> <li>11. Comment Acknowledged, this is due to the need to compress very large digital copies of the document. Better quality maps will be created in future to ensure clear illustration of information.</li> <li>12. Acknowledged</li> <li>13. Acknowledged</li> </ul>
Holcombe Burnell CP	No Response	-
Ideford CP	No Response	-
Ilsington CP	No Response	-
Kenn CP	No Response	-
Kenton CP	No Response	-
Mamhead CP	No Response	-
Powderham CP	No Response	-
Starcross CP	No Response	-

		Page 105
Consultee Name	Consultee Comment	FC Response
Bovey Tracy Fire Station		-
Exeter Middlemoor Fire Station		-
Haldon User Group		-
NGOs		
RSPB	The RSPB welcomes and supports the general thrust and direction of travel of the land use and habitat management articulated in this consultation draft Haldon Forest Design and SSSI Plan. In particular, we welcome some of the steps that it makes towards the restoration and management of lowland heathland on the Haldon ridge and towards conserving Haldon's nationally important nightjar population.  There remain however some aspects of the Plan which we do not support, in particular the proposals for wooded heath, which we consider will risk permanent harm to the site's heathland potential. We seek reassurance and clarity on a number of issues. I hope that you find our detailed comments, appended, helpful. Please do contact me if any of them are unclear or you wish to discuss any of them. Year Vision (page 10)  1. We welcome the vision for heathland to become a more significant land use on the Haldon ridge, and for its active management as dwarf shrub (rather than rotational succession to secondary woodland).  2. We question the rationale for wooded heath on heathland soils; in particular of letting up to 100% woodland cover develop on heathland, with rotational clearance. Such management will increase cumulative soil nutrients, compromising the soils' ability to retain low soil nutrient dependent heathland species and encouraging more vigorous, common species colonise. Such management should only in our view be planned for where it would manifestly benefit non-heathland SSSI interests.  3. We also question the financial rationale for such management, if it is driven by limited resource: assuming a 15-25 year rotation of natural regeneration, it must be highly questionable whether the value of the arisings would offset the cost of clearfelling. It may end up being more cost-effective, as well as greatly more ecologically valuable, to maintain heathland, components of which will include scrub and trees, particularly if managed through, inter alia, grazing.  4. We therefore suggest that the ambition of a dynamic an	1. Acknowledged  2 - 4. Wooded heath is a more historically authentic delivery of heathland habitat than lowland heathland caught in suspension. The cutting and removal of material before grazing was how these areas were historically managed. These areas have not suffered as a result of this form of historic management and it has not hindered their future reversion potential.  Removal of woody material at first economic opportunity means that the operation is not a cost to the organisation and is therefore sustainable. The use of cutting, grazing and burning across large areas is not sustainable in the current climate or in line with FC Policy.  Mention ecology before economics - a more dynamic system of mosaics of open habitat, developing scrub and wooded heath provides an ecologically richer habitat than lowland heathland per se. Query why we only need to be delivering heathland specialists on non designated sites as per

Consultee Name	Consultee Comment	FC Response
	50 Justification (page 11)	
	5. We welcome an objective assessment of heathland opportunity on the Haldon ridge. However, we question the appropriateness of the application of the proposed attributes which justify areas as forest, which appear to preclude realization of 89% of acknowledged heathland potential and are inconsistent with Government policy. We consider these below:	5. Acknowledged
	i. Conifer yield class	
	6. There is no public policy rationale for the use of yield class as a determinant of the future use of afforested heathland in public ownership. When to convert woods and forests to open habitat in England (March 2010) sets out Government policy on this matter. At Section 5.2, it includes a clear decision making framework for when Government may i)support, ii) allow and iii) not allow, restoring open habitats from woods and forests. It states We will also use this framework when undertaking forest design planning on the public forest estate.	6 – 9. Yield Class is stipulated as a determinant factor in When to convert woods and forests to open habitat in England (March 2010) 5.3.2 (pp.20). This stipulates that land that does not grow high quality timber well (less than Yield Class 10) will be favoured. For clarity and definitiveness this Plan has used a bench mark of Yield Class of 12 and all these sites low productivity sites have been ground surveyed as true.
	7. 5.2.2 Sites we may not allow sets out the conditions under which Government will not normally allow open habitat restoration from woodland and forestry. None of them make any reference to forestry productivity.	
	8. Section 5.3.2 suggests that the decision framework favours the conversion to open habitat of land that does not grow high quality timber well because the highest benefits to biodiversity will tend to be on sites of lower fertility. In other words, the judgement of whether a site is suitable for open habitat restoration is its ecological potential – which may be a function of low timber yield – not its productivity per se.	
RSPB continued	9. We therefore fundamentally disagree with the removal from the site's potential heathland of afforested heathland with a Yield Class of 12 or more. This would be a major departure from Government policy. All the more so given the site's SSSI status for, inter alia, its lowland heathland interest. We seek reassurance that no areas have been discounted on the basis of timber productivity from heathland SSSI units.	
	ii. Broadleaf Areas	
open habitat. It makes clear that Go native woodland in exceptional circu is: sites currently composed of native or sites where a proportion of the cumbere the woodland canopy has been a site of the cumber of the where the woodland canopy has been attended in the cumber of the cumb	10. Government policy also defines when native woodland should be considered for restoration to open habitat. It makes clear that Government will only allow permanent removal of mature native woodland in exceptional circumstances. The Policy's definition of mature native woodland is: sites currently composed of native broadleaves that have been wooded for at least 80 years; or sites where a proportion of the current native broadleaved crop is at least 80 years old and where the woodland canopy has been closed (>70% canopy cover) for at least the last 20 years.	10 -12. Given the small amount that broadleaf cover actually makes up within the area all broadleaf areas are protected. The amount of broadleaf areas greater than 80 years is limited and therefore all established broadleaf areas are considered for their contribution to the habitat mosaic and supporting of protected species such as dormice. This ecosystem is considered valuable to the landscape character and
	11. It is not clear why these definitions have not been applied in Step 2 of the draft Haldon FDP's Rationale, which rather uses naturalized broadleaf cover with an average dbh >30cms.	habitat functioning.
	12. Again, this represents a worrying inconsistency with Government policy. Whilst RSPB would not advocate felling of mature native woodland to restore heathland, we consider that the assessment should use Government's definition of mature native woodland.	
	iii. Visitor Experience	
	13. It is in our view wholly inappropriate to dictate land use within a SSSI according to visitor use, and to prevent delivery of a core SSSI objective within a blanket 400m of visitor hub facilities. It is alarming that this is being promoted by a public body. We seek reassurance that no areas have been discounted on the basis of proximity to visitor hubs.	13. The trees are intrinsic to the visitor experience at Haldon Forest Park. People value being able to come to a robust forest landscape where they can experience nature and exercise close to an urban centre. Whilst there is significant amount of historic heathland 68ha and 10ha of future restoration within close proximity of the Hub (i.e. 300m), a 300m buffer protects the ecological robustness of 17ha of the site in an area of high disturbance and provides considerable heathland expansion and

Consultee Name	Consultee Comment	FC Response
	14. We welcome and fully support the Reasons for additional heathland areas suitable as forest, to better connect existing and potential heathland areas to facilitate more efficient management and better ecological value. It is not evident that the Plan goes that far in planning for broad connecting corridors of heathland - or at least open habitats – out to the more isolated areas of lowland heathland.	14. See pages 37 and 63 for connectivity commitments, some of which is covered in the Environmental Corridors Policy. The Plan makes provision for 67ha of heathland which is also suitable as forest to connect areas.
	15. 15. Whilst it will be clear from the above that we disagree with the decision-making process, which is at odds with Government policy, the intent is to restore a further 132ha of lowland heathland (81ha from Steps 1 and 2 and 51 from Step 3). On that basis, RSPB strongly welcomes and supports the direction of travel proposed for heathland restoration on Haldon, which remains the most significant opportunity to restore high value lowland heathland habitats in Devon and Cornwall.	15. Acknowledged
	Management Objectives (page 12)	
	16. The Venn diagram omits objectives for the nature and economy and the nature and people overlaps. Examples of the former could be the services that a well functioning natural environment provides to society, such as flood alleviation, water purification, timber. And the latter include the well documented physical and mental health benefits to people of being in high value natural environments and the direct and indirect values people place on rare species and habitats.	16. The Forest Plan area provides a multitude of ecosystem services, functions and services many of which both contribute to the economic and ecological value of the area. These can not all be listed
	17. The objectives identify the creation of just 14 ha of additional open space. Presumably this is a typo - it is certainly unclear how it relates to the figures set out in the rest of the plan.	17. Wording on page 13 now updated to include 'in Plan period 2017-27' to clarify commitment.
RSPB continued	18. We welcome the continued delivery of transient open space through clearfelling, with 82ha proposed in the plan period, since this is such an important land use for Haldon's nationally important nightjar population. We seek reassurance that this is additional to areas of identified potential heathland.	18. Mistake acknowledged. Figure of 82ha includes 14ha of heathland reversion.  Wording now updated to refer to 'clearfell and restocking programme of 68ha' for clarity
	19. The Analysis and Concept maps for the Main Block (north and south) don't appear to have changed at all since their previous iteration. Our interpretation is that, whilst it could go significantly further, this draft plan represents a shift in FE's intent with regard to restoring and managing lowland heathland and we consider that this should be recognized even in these broad brush maps.	19. Acknowledged, it is difficult to include all aspects of Plan analysis in these maps. The Vision clearly outlines our change in approach and justification however wording has been changed to, consideration will be made for where to target and significantly extend open habitat.
	SSSI Conservation Objectives and Management Aims (page 28)	
	20. It's unclear why the Management aims don't include an objective to increase heathland area, to reflect the acknowledged need and proposals to do so. We consider that this should be an explicit management aim.	20. The increased provision for lowland heathland does not contribute to the overall objective of the SSSI and will not affect the condition assessment — unless it leads to a loss in raptor numbers. The increased provision of heathland is as a result of justification for forestry and finding a balance in the landscape which then
	21. As drafted, Aim 2 suggests that it's desirable to maintain a level, albeit low, of non-native scrub. It would be helpful to word it differently to clarify the objective is to eradicate non-native scrub from relevant SSSI units, such as – minimal cover, preferably absence, of non-native scrub	contributes to ecology.  21. Acknowledged, wording updated accordingly to: minimal cover %, preferably absence, of non-native scrub cover including regenerating conifers, rhododendron
	22. 7 is in our view wholly inappropriate as a SSSI Management aim. Whilst FE seeks silvicultural and recreational benefits from Haldon Forest, they cannot be management aims for the SSSI. They have the ability to harm the SSSI and as such the management aims of the SSSI should not seek to ensure their continued delivery. Rather, in our view, it would be appropriate for the aim to recognize FE's relevant non-SSSI objectives, and to include an aim to ensure that they don't compromise the SSSI's objectives. In our view, given the very large visitor numbers encouraged by FE to Haldon Forest, and the well documented risks that people present to ground nesting birds, and nightjar in particular, it would be appropriate to have a dedicated SSSI management aim to ensure that Haldon's nationally important nightjar population is not disturbed by people.	<ul><li>and laurel</li><li>22. Acknowledged, Objective 7 has been removed. The overall Plan objectives make the following aim to cover all aspects of the SSSI: The restoration and management of the Site of Special Scientific Interest.</li></ul>

Consultee Name	Consultee Comment	FC Response
	SSSI Analysis and Concept (page 29)	
	23. We welcome and support the general thrust of the proposals, which should enhance the site for its SSSI interest features. What is not clear from this however is whether any restocking on heathland units of the SSSI are proposed. We seek reassurance on this matter. Such activity is not supported by Government policy and we would strongly object to it.	23. No conifer planting or wooded heath is proposed within existing heathland areas, 40ha of lowland heathland creation will occur in Unfavourable condition units to benefit existing heathland areas. Some areas of Unfavourable condition units will be replanted, this is defined on pages 52-53 according to site condition and justified is on page 11.
	SSSI Raptor Assemblage (page 31)	This is not to the detriment of heathland areas.
	24. We welcome the trial presumption against harvesting in the bird breeding season within the SSSI. Another way to reduce breeding failure due to disturbance in situations where raptors establish nests close to recreational trails (likely early in the year, when trails are used at relatively low levels) is to establish a visitor-free buffer around nests by diverting trails until young have fledged.	24. Acknowledged, wording on page 119 reflects this with any new trails will be subject of discussion between FC and NE at the planning stage. And any events planned for within the bird breeding season will be assessed for their likelihood of disturbance and re-routed if necessary
	SSSI Nightjar (page 32)	, and the second
	25. The significant planned reduction in nightjar habitat provision through the 2020s and 2030s is a real concern, particularly given that it is a qualifying feature of the SSSI and that Haldon's population is nationally important. We therefore welcome the proposed measures to mitigate this reduction, through increased creation of open habitats in the next 10 years and the commitment to maintain a minimum of 494ha of Haldon forest within rotational clearfell management, with no net increase in continuous cover forest management within the SSSI.	25. Acknowledged.
	26. It will in our view be critical that, following 2016's nightjar survey, the proposed repeat	
	monitoring every 5 years is undertaken. There should in our view be a commitment to ensure that, should repeat surveys suggest a declining population, measures are put in place to reverse the decline.	26. Commitment has been changed to <i>monitored regularly</i> in anticipation that nightjar surveys will be surveyed more than every five years.
RSPB continued	27. One aspect of Haldon's nightjar ecology that it would be highly beneficial to understand is their breeding productivity. We would be keen to explore work with FC to research the population's breeding productivity, in particular to understand whether the territories that are most likely to be disturbed by visitors, due to their proximity to well used access tracks, are being affected.	27. Acknowledged
	SSSI Pearl-bordered fritillary and Small-pearl bordered fritillary (page 33)	
	28. We welcome the plan's proposals for these SSSI features.	28. Acknowledged
	Ancient Woodland (page 35)	20. Acknowledged
	29. We welcome the plan's proposed PAWS restoration.	
	Future Open Habitat Management (page 37)	29. Acknowledged
	30. This section helpfully clarifies the Plan's proposals for lowland heathland. We strongly commend FE for the efforts undertaken over the past decade and more to restore significant areas of heathland on the Haldon ridge, and to introduce grazing management for some of it. It is clear from last year's nightjar survey that the heathland areas are a really important feature for breeding and foraging nightjars, as well no doubt as a host of other heathland specialists. RSPB is keen to work with FE to support continued ecological establishment of these areas, and to address any difficulties with management as they arise.	30. Acknowledged
	31. We remain of the view that the Haldon ridge offers the best opportunity in Devon and Cornwall to restore substantial areas of high value lowland heathland, and that FE should continue with a programme of restoring heathland. We therefore welcome the Plan's intent to create a further 35ha of lowland heathland, to be managed to Priority Lowland Heathland parameters as defined by NE, through grazing where possible. What is unclear from this is whether it is FE's intent to restock felled or thinned forestry within lowland heathland SSSI compartments. To do so would in our view be wholly inconsistent with Government policy. We seek reassurance on this matter.	31. Acknowledged. To confirm no conifer planting or wooded heath is proposed within existing heathland areas, 40ha of lowland heathland creation will occur in Unfavourable condition units to benefit existing heathland areas. Some areas of Unfavourable condition units will be replanted, this defined on pages 52-53 according to site condition and justified is on page 11. This is not to the detriment of heathland areas.

Consultee Name	Consultee Comment	FC Response		
RSPB continued	<ol> <li>As expressed elsewhere in this response, we disagree with the plan's proposals for Wooded heath. We accept that it will have some ecological value, but consider that its specialist ecological potential will be permanently compromised by managing it on a rotation that allows trees to grow to full canopy cover.</li> <li>We welcome the qualification that, if an external party or funding opportunity allows, more intensive open habitat maintenance can be implemented. This suggests that the principal reason for this proposed management is a lack of resource to deliver lowland heathland management. RSPB is keen to work with FE to explore options for managing these areas as lowland heathland.</li> <li>What is not clear from the plan is whether any restocking, particularly of non-native trees, is proposed on any of the heathland units of the SSSI. It would be helpful if FE could clarify whether any such activity is proposed. Certainly RSPB does not consider that such activity could be justified under any Government policy and we would strongly object to it.</li> </ol>	32. Acknowledged  34. Acknowledged. No conifer planting or wooded heath is proposed within existing heathland areas, 40ha of lowland heathland creation will occur in Unfavourable condition units to benefit existing heathland areas. Some areas of Unfavourable condition units will be replanted, this is defined on pages 52-53 according to site condition and justified is on page 11. This is not to the detriment of heathland areas.		
Butterfly Conservation	No Response	-		
Devon Mammal Group	No Response	-		
Devon Birds	No Response	-		
Devon Wildlife Trust	No Response	-		
Devon Biodiversity Record Centre	No Response	-		
OTHER STAKEHOLDERS				
Go Segway	No Response	-		
Bike Hire	No Response	-		
Ridge Café	No Response	-		
Adventure Forest (GoApe)	No Response	-		
Powderham Estate	No Response	-		
Clifford Estate	No Response	-		
Whiteway Estate	No Response	-		
Higher Netton Farm	No Response	-		

Consultee Name	Consultee Comment	FC Response
Tamar Valley Associate for Shooting & Conservation	No Response	-
Kennford Court	No Response	-
NPS	No Response	-
Esso Garage	No Response	-
Exeter Racecourse	No Response	-
Member of Public	I do not want to see much change from the way it is now, i.e. no more paying car parks, no more cycle trails and no more urbanisation of the woodland. The Bullers hill area (magic wood) was fantastic for my children when they were growing up but now is a no go area because of the mountain bikers! We as a family use the woods probably about six days a week to walk our dogs so a few more trails would be good but we just like the peace and tranquillity Haldon offers it is also a safe place to let the dogs have a good run. Also as my wife is a horse owner she requests some more bridal paths. All in all at the moment I feel there is a good balance between commercial interest and un spoilt woodland, I accept that felling is necessary to keep the forest healthy, if it can be done sympathetically then thats good. Haldon is a place of beauty please do not spoil it.	Acknowledged, comments passed to Recreation and Estates teams.
Member of Public	It would be great to have the trees cleared near the Mamhead obelisk so it can be seen from the sea and Exmouth.  We love the peace and quiet (non-commercial) nature of the area around the obelisk -ie: no bikes etc. (once Haldon forest park was like this - we could walk for miles and look at the local nature and go on a butterfly walk in peace and quiet. Now it is like the M25 up there!)  Please do not make this area commercial (no parking charges would also be appreciated -we are not all wealthy) -And no noisy generators from posh coffee caravan/trailers! A few more dog waste bins and some litter bins would be helpful so that we can put the occasional litter that we find and pick up from visitors in a bin.  The fire beaks on Ideford common used to be maintained - but seem to be disappearing. This was the only place I have every seen tiny lizards basking in the sun. They have disappeared now because the fire breaks have over grown. It is a now a high fire risk as well.	Removal of trees around the Obelisk is part of the Plan in 2022-26, but is dependent on the structural integrity of the structure to withstand significantly increased exposure. See page 79, Coupe Reference 81932.  Acknowledged, comments passed to Recreation and Estates teams.  Fire breaks are managed on a rotational basis according to need and surrounding habitat wildfire potential
Member of Public	The woods should be free to walk without fear of others, it is a place to enjoy. My fear is the allowance of organised/permitted husky type dogs to run riot and distress me and my woof is unacceptable. There are fixed signs saying husky training area but no notification of when or is just always and anytime. The fixed notices should state their allowed times so I can avoid and thus every non husky owner - ie those with young kids, oldies like me and some with dogs are inhibited to take the full advantage of that on offer at the expense of the few who can be accommodated if there were advertised at each entrance that it was unsafe to enter - like a firing range almost.	Huskies are only permitted in one relatively small area of the Forest Park. This is clearly sign posted and limited to certain times of the time. If unsure or unhappy with exercising in this area there are adequate alternatives within very close proximity or please contact the Rangers Officer at the Hub.  Comment passed to Recreation team

Consultee Name	Consultee Comment	FC Response
Member of Public	I welcome the measures to support biodiversity and enhance the environment and provide water and carbon retention features as well as providing for public access.  As a regular walker in the area where huskies are provided for I have significant concerns. I have had a scary experience with a team appearing virtually silently and at great speed when the 'drivers' have very little control and the huskies appeared to want to attack my two dogs and it was difficult to get myself and my dogs out of their way in time. I have met other members of the public who have felt similarly intimidated including one elderly gentleman who was extremely upset by a recent incident and was fearful of walking in the forest in case it happened again. The provision of so many routes and such a large area for huskies seems out of proportion to the percentage of the public who enjoy this sport as against normal walkers.  I was told by someone that the huskies can only use the area during the period of one hour after sunrise and one hour before sunset. I have no idea whether this is true or not and will not walk in the woods in those hours just in case as I too am afraid of having another incident.  a) I would suggest that the huskies should be given a reduced area limited to one compartment to the east of the A380 not two.  b) Whether or not this proposal is accepted I think a limited time period is a good idea if not already implemented and  c) I would urge the introduction of good signage beside the entrances to tracks within the huskies area informing the public of any restrictions on the time of use of the designated area. This would be a great improvement and give some reassurance to the general public who currently have no idea what to expect when and who currently feel their enjoyment is blighted by this provision for the few. I would also suggest that management of the flying of drones should be considered, having seen/heard this in the forest a few times, so that they do not disturb the birds, particularly during nesting.	Huskies are only permitted in one relatively small area of the Forest Park. This is clearly sign posted and limited to certain times of the time. If unsure or unhappy with exercising in this area there are adequate alternatives within very close proximity or please contact the Rangers Officer at the Hub.  Comment passed to Recreation team