

CONSULTATION

Response Document



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Submission on the

Scoping a new forestry plan for North West forests and woodland

to

Forestry Planning,
Department of Agriculture, Environment and Rural Affairs

28 February 2018

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), being the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to participate in this consultation process.

CIEEM was established in 1991 and has more than 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

Amongst others, CIEEM is a member of:

- National Biodiversity Forum (Ireland)
- Irish Forum on Natural Capital (working group member)
- The Environmental Science Association of Ireland
- Europarc Federation
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- The UK All Party Parliamentary Group on Biodiversity
- The UK Environmental Policy Forum

CIEEM has approximately 250 members in Ireland (North and South) who are drawn from across the private consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and industry. They are practising ecologists and environmental managers whose work involves sustainably managing habitats - terrestrial and aquatic habitats (marine and freshwater) - and species.

Preamble

CIEEM welcomes the opportunity to participate in the consultation process in respect of scoping a new forestry plan for the North West area forests and woodland, and thanks DAERA for its invitation to do so.

This review has been undertaken by the CIEEM Ireland Policy Working Group. The Policy Group comprises experienced, Irish-based, practitioners and specialists with a wide breadth of knowledge across the ecological and environmental management spectrum throughout the island of Ireland.

Comments from CIEEM

CIEEM understands from DAERA that the opportunities identified in the North West scoping document are very similar to those in the Antrim scoping documents to which we had responded previously and that our responses are applicable to forestry in Northern Ireland in general. For this reason, we refer DAERA to our response on the Antrim Area Plan which is appended to this response at Appendix 1.

CIEEM is generally supportive of the Plan but requests that sufficient funding is made available in order to ensure its delivery. In particular, the greater emphasis being placed on low impact silvicultural systems is to be welcomed, as is the commitment to protecting habitats and species.

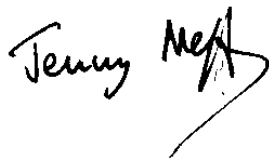
We consider that our comments on the Antrim forest area are indeed appropriate in the context of the North West forest area and as stated in our response to the former, given the general nature of the scoping document, it is not possible to provide specific comments across all of the Topic areas. We should, however, like to draw attention to the following points in relation to the North West forest area:

- There are no known freshwater pearl mussel sites within this area so no additional requirements for the species are necessary.
- With regard to possible overlaps with restoration of high status sites (if any?) there is no mention of whether the Water Framework Directive (WFD) activities in providing buffers cover all WFD requirements. They may be sufficient for good status but are unlikely to help in the case of high status sites.
- Page 9, Water Framework Directive: Where there is an objective to restore high status sites there should be significant cooperation with other competent authorities, particularly with respect to the restoration of open wetland habitats.

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CIEEM members are knowledgeable about the natural heritage of the island of Ireland and, as a professional body representing practicing ecologists and environmental managers, CIEEM is well placed to advise on specific areas of biodiversity now and in the future.

CIEEM would welcome the opportunity to review any future draft of this and/or other Plans as they become available.

A handwritten signature in black ink that reads "Jenny Neff". The signature is written in a cursive style with a large, sweeping flourish at the end.

Jenny Neff BSc(Hons) MSc(Ecol) CEcol CEnv FCIEEM

Chair, CIEEM Ireland Policy Working Group

February 2019

APPENDIX 1

CIEEM Response Submission on

Scoping a new forestry plan for Antrim area forests and woodlands

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Scoping a new forestry plan for Antrim area forests and woodlands

to

Forestry Planning,
Department of Agriculture, Environment and Rural Affairs,

29 May 2018

Introduction to CIEEM

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Comments from CIEEM

CIEEM welcomes the opportunity to participate in the consultation process in respect of scoping a new forestry plan for the Antrim area forests and woodlands.

This review has been undertaken by the CIEEM Ireland Policy Working Group, specifically by Northern Ireland – based members of the Group. The Policy Group comprises experienced, Irish-based, practitioners and specialists with a wide breadth of knowledge across the ecological and environmental management spectrum throughout the island of Ireland.

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CIEEM would like to make a number of general and specific comments on the consultation document, as follows:

GENERAL COMMENTS

CIEEM is generally supportive of the Plan for the Antrim Forest Area but requests that sufficient funding is made available in order to ensure its delivery. In particular, the greater emphasis being placed on low impact silvicultural systems is to be welcomed, as is the commitment to protecting habitats and species.

Whilst generally supporting the approach across the 11 scoping topics, CIEEM is concerned that the importance of local provenance native species has not been highlighted. It is considered that the Forest Service should, and is in a good position to, promote and support the growing of native species locally to protect and enhance biodiversity, and we would encourage the Forest Service to take the lead in NI on developing local businesses to supply the local market. Currently it is extremely difficult to purchase local provenance native tree species in Northern Ireland so that the public and organisations are forced to source native species outside the island. This increases the risk of introducing and spreading tree diseases and IAS.

It is considered that more information is needed on how plant diseases, and an indication as to how plant diseases (such as ash dieback) will be dealt with in forestry planning.

Given the general nature of the scoping document, it is not possible to provide specific comments across all of the Topic areas at this time, however some key areas are addressed below.

SPECIFIC COMMENTS

Topic 1: Enhancing Landscapes

- It is suggested that reference should be made to character areas as described in The Northern Ireland Regional Landscape Character Assessment

Topic 2: Protecting Rivers and Lakes

- We consider that Forest Service should liaise with relevant bodies on adapting forestry policy for the freshwater pearl mussel, to review innovative mechanisms to reduce sediment entering watercourses, in particular for felling operations and forest design.
- It is noted that whilst salmonid and angling concerns are referred to in this section, as are the benefits to aquatic ecology of native broadleaved and riparian woodland, there is limited discussion around the potential effects of forestry operations on aquatic ecology - either in Topic 2 or Topic 10.
- It is considered that a commitment to assessment of the potential for impacts (including sedimentation and nutrient enrichment for example) should be provided.

Topic 3: Enabling Enjoyment of Forests by Local People and Visitors

- It is considered that, in some cases, increased recreational use of forests (or areas within forests) has the potential to impact on important ecological features such as protected habitats and species. Restrictions on activities may be needed in order to afford the correct level of protection.
- There appears to be no recognition that plans to increase recreational access should be subject to the relevant assessments such as EcIA¹ or HRA² where appropriate.

Topic 4: Promoting Afforestation and Sustainable Forestry

- It is suggested that more emphasis should be placed on protecting soils and soil biodiversity which is essential, not only for the growth of trees sustainably (Topic 7) but also to ensure a reduction in the use of chemical fertiliser.
- It is considered that woodland expansion and increasing connectivity should be assessed both in terms of the potential benefits to ecological features such as mobile species and in respect of potential risks such as facilitating the spread of invasive species.

Topic 5: Supplying Sustainable Wood Products

- The proposed use of GIS for harvesting plans is welcome and it is suggested that this should also be used to analyse the potential wider landscape or catchment scale implications for biodiversity.

¹ Ecological Impact Assessment (EcIA)

² Habitat Regulations Assessment (HRA)

Topic 8: Minimising the use of Pesticides and Fertilisers

- The commitment to minimising the use of Pesticides and Fertilisers is a very welcome approach but we would like to see a further commitment being made to assessing current and future impacts of both pesticide and fertiliser on catchments. Fertiliser applied as an aerial spray can often drift outside the boundaries of the forest plantation onto non-target vegetation which can have a detrimental impact on habitats that are naturally low in nutrients (notably peatlands and heathlands). It is recommended that measures should be taken to reduce the effects of fertiliser drift on adjacent non-forested habitat.

Topic 9: Targeting Invasive Species [IAS]

- Whilst the inclusion of actions on IAS is welcome, it is considered that action should not be restricted to the referenced key species for control (ie. *Rhododendron* and Cherry Laurel) and that consideration should also be given to other widely-occurring species such as Japanese Knotweed and Himalayan Balsam.
- Where invasive species are identified on Forest Service lands, a long-term strategy should be developed for their eradication.

Topic 10: Protecting Habitats and Species

- This should include NI priority habitats as well as European habitats. Some of the priority habitats described here are NI Priority Habitats, not EU Habitats Directive habitats. It is suggested that the differences between EU Habitats and NI Priority Habitats should be referenced for clarity, along with the relevant legislation.
- It is considered that it should be made clear that forestry operations have the potential to impact on designated sites that are not included within the forestry area itself (for example, those within zones of influence as described in CIEEM Guidance on EclA³) which could be at significant distances, depending on pathways between the forestry site(s) and the designated site.
- As mentioned above (Topic 4) it is considered that the importance of forest soils should be included, along with an outline of measures to protect and enhance forest/woodland soils.
- It is considered that there should be to some reference to ecosystem services in the Plan.
- It is considered that a commitment should be included in respect of providing species record data held by the Forest Service to CEDaR⁴ as standard procedure. A commitment to provide data on Forest Service lands in general, habitat mapping and species records, on Open Data NI would be welcome.

Topic 10 (second listed Activity)

- It is considered that forest plans and associated actions or projects should be subject to EclA to ascertain the potential for impact on important ecological features, either positively or negatively.

³ https://www.cieem.net/data/files/Publications/EclA_Guidelines_Terrestrial_Freshwater_and_Coastal_Jan_2016.pdf

⁴ Centre for Environmental Data and Recording (CEDaR)

Topic 11: Restoring Peatland Habitats

- Whilst the Plan acknowledges that most afforestation in the past has occurred on peatland habitats, it would be useful to broaden the approach to include restoration of Northern Ireland priority habitats.
- Whilst there is recognition that Antrim forests are "significant refuges for red squirrel and raptors", there is a lack of recognition that this Plan has the potential to impact on the network of protected sites throughout the country through impacting on important mobile species, some of which will be qualifying features of protected sites. It is considered therefore that the Plan should acknowledge the potential importance of forests as 'stepping stones' for mobile species.
- It is not clear if the likely requirement for screening of the Plan under SEA⁵ and /or HRA has been considered.
- It is considered that recognition should be given within this section that the over-riding objective for Forest Service land within designated sites should be the maintenance and restoration of the habitats and species for which the site has been designated. Whilst acknowledging that designated sites can be areas where people live and work, and land can be used for other purposes, the maintenance and restoration of qualifying habitats and species should be a priority.
- As above (Topic 10) it is considered that a commitment should be included to providing species record data held by Forest Service to CEDaR as standard procedure.
- Identification of candidate areas for restoration should be carried out in consultation with NIEA and relevant stakeholders.

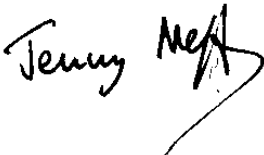
Appendix II: Environmental regulation, designated areas, and historic monuments

- We should like to draw attention to the fact that any plan or project which has the potential to have a significant effect on a designated site should be assessed under the relevant legislation - not just those plans or projects *within* a designated site.

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CIEEM members are knowledgeable about the natural heritage of the island of Ireland and, as a professional body representing practicing ecologists and environmental managers, CIEEM is well placed to advise on specific areas of biodiversity now and in the future.

CIEEM would welcome the opportunity to review any future draft of the Plan as it becomes available.



Jenny Neff BSc(Hons). MSc(Ecol). CEcol CEnv FCIEEM

Vice-President (Ireland) of the Chartered Institute of Ecology and Environmental Management (CIEEM)

⁵ Strategic Environmental Assessment (SEA)