

## **Comments on Fineshade Forest Plan**

### **Plans for Low Impact Silvicultural Systems**

Over the three woodlands, 740 ha will be managed through the removal of single and small groups of trees. In Fineshade Wood approximately 2/3 of the area are included with all the Ancient Woodland and most of the Plantation on Ancient Woodland managed in this way. I very much welcome this approach, with no more than 40% of the trees in any coupe felled over the 10 years of this plan. This gives the individual forester considerable flexibility and licence, placing great responsibility on their shoulders. In the last two years we have been very impressed by the care and insight that has gone into similar operations and look forward to seeing more like this.

### **Plans for a Natural Reserve**

We are delighted to see that the plan classifies some of Fineshade Wood as a Natural Reserve with no active woodland management and the area left to evolve naturally without any human intervention. This is particularly welcome since Fineshade is widely acknowledged as especially important for wildlife. Forest Holiday's ecological surveyors were recorded in 2015 as saying "this wood is amazing ... it should be a nature reserve". Natural England have placed Fineshade Wood on their list of sites for further investigation for future designation as SSSI. NE's Chief Exec confirmed this in writing to our MP and included the phrase "Fineshade wood is a wonderful place for wildlife". Therefore it is quite possible that during the lifetime of this Forest Plan the SSSI designation, which Friends of Fineshade have pressed for, will become a reality. (See <https://www.fineshade.org.uk/sssi>). Given all this we are rather disappointed that only 2.4 ha of Fineshade is to be classified as a Natural Reserve, although we recognise that many of the other proposals made in the plan (apart from replanting conifers) will benefit wildlife. Table 1 on page 8 indicates that across the Forest District as a whole a total of 4.7% is designated for Natural Reserves (1.4% plantation plus 3.3% semi-natural). Fineshade Wood alone has an area close to 500ha, so to reach the district average, Fineshade should have Natural Reserves totalling 4.7% of 500 = 23.5ha. It can certainly be argued that given Fineshade's wildlife richness one would expect significantly more than average to be designated as Natural Reserve.

The following locations are suggested as additional areas that could be considered for designation as Natural Reserves:

- a) A riparian area alongside the stream that forms the western boundary of Fineshade Wood, stretching from approx. SP97559867 to SP97869929. A large part of this area consists of wet woodland, particularly Alder Carr which is a most unusual habitat in Northamptonshire. Visiting naturalists have found very large numbers of species with fungi, flies, moths, beetles and bryophytes of particular interest. Otters use the stream and there is a possibility that Water Voles may be present. A variety of birds that are unusual elsewhere have been recorded. The area includes Fineshade's best pond for aquatic invertebrates and is fed by springs emerging from the limestone escarpment. Because of the wetness of the soil we think the area would be of little economic interest. A strip could be designated 100m wide for a length of 800m beside the stream, giving a total area of 8ha.
- b) An area to the northeast of the Deer Lawn and wildlife hide, spanning both sides of the valley known locally as The Gullet and extending east as far as Dumb Bob Spinney. It includes some Ancient Woodland and some land which was previously farmland where various planted timber crops have failed. This would include an extensive area of ancient coppice stools, a heritage feature not mentioned in the plan. Again this is an important area for wildlife with beetles, butterflies, flora and

fungi of particular importance. Along the Gullet itself are many veteran trees. The area is well away from any current walking or cycle track and it is this lack of disturbance that is particularly beneficial to wildlife. I believe that one of the areas set aside to be managed for reptiles could be incorporated into this area. We estimate that this area could easily incorporate 10 to 12ha.

- c) The 2.4 ha. already proposed Natural Reserve to the south of Buxton Wood could be doubled in size with little economic loss and probable bio-diversity gain. In particular an area to the north of the pond and the east-west ride could be included. This is currently largely open and has a natural south-facing slope which makes it attractive for insects and reptiles.

The above three areas are the most obvious candidates for Natural Reserves but there are many other areas that could also be included, for example, the areas of deep swallow holes in North Spinney and Long Spinney, parts of the flat former farmland of Smiths and Cunnington Spinneys, and the extreme north-eastern tip of the Assarts where there is a pond complex and a stand of Huntingdon Elms. We appreciate that many of these suggested areas are currently designated for LISS and with very sensitive management they can certainly be preserved as havens for wildlife. However, by designating greater areas as Natural Reserve Forestry England could demonstrate more clearly that they agree with others' assessment that Fineshade Wood is indeed a very special place for wildlife.

### **Plans for open spaces**

On page 16 of the plan, the map shows current tree species and there appear to be several areas that are coloured white, denoting Open Space. The pie chart on that page indicates that together these areas make up 13%. Within Fineshade they include wide rides, the "deer lawn" in front of the Wildlife Hide and the areas around Top Lodge all of which are currently well managed and kept as open space. This is of great benefit to wildlife and contribute positively to the landscape. There are also areas coloured white on p16 which are currently scrub or struggling planted trees. However on pages 20-22 where felling periods are shown, the same areas are not all shown white. In particular in Fineshade the currently managed rides and "deer lawn" are coloured mauve representing LISS. The management of rides is listed as an Forest Plan Objective on page 10 but no details are given elsewhere. It is also good to read on page 6 that new transitional open spaces will be created to help the local Adder population, but it is essential that current management regimes of open spaces are maintained too. Please can more detailed reassurance about this be included in the plan? Also the Table on page 8 indicates that the percentage of open habitat in the Forest Plan area (9.6%) is well below that of the Forest District as a whole (15.3%). There is scope for further open spaces to be created, particularly where conifer stands are clear-felled.

### **Plans for planting native trees**

Searching the Fineshade Forest Plan for "native" yields a single mention on page 10 of native habitats but no mention at all of native trees. This is in stark contrast to other recent FE Forest Plans. For example, Mortimer Forest Plan (West England Forest District) uses the word native 68 times and develops the concept of "Naturalness" to describe the % of tree species that are native to a particular site. Both plans also stress the importance of planting species that are resilient to climate change and pests and diseases and we appreciate that argument. In discussion with FE staff it was reassuring to hear that there is no intention of planting only non-native species. We were told that restocking will be with a mixture of species, including native species (such as Wild Service, and Hornbeam), and naturalized species (including for example Sweet Chestnut and Sycamore). However we would like to see this proposed mixture made more explicit in the plan. Proposed rewording is below. Additions in italics

- On page 5 (section 2.1) : “The use of new planting stock will allow for the introduction of new *native and naturalized* species that will be more resilient to environmental changes and threats.”
- On page 6 section 2: “Forestry England will use the Ecological Site Classification (ESC) tool developed by Forest Research to help select a *mixture of species* of trees that are best suited to the local soils and effects of lower summer rainfall, wetter winters, increased temperatures and the increased frequency of catastrophic winds. *This will include both native and non-native species*”
- On page 8 (section 3): “Forestry England will use the Ecological Site Classification (ESC) tool developed by Forest Research to help select *native and non-native* trees that are best suited to the local soils and effects of lower summer rainfall, wetter winters, increased temperatures and the increased frequency of catastrophic winds. “
- Also on page 8 (section 3: “The use of nursery grown trees will again allow new provenances of *native trees* and different species to be introduced to increase resilience to pest, disease and climate change. “

### **Plans for conifers**

We are very disappointed to see that there is very little overall planned reduction in conifer coverage and that, even where conifer plantations are cleared on secondary woodland, they will mainly be replaced by conifers for future rotations. We believe that the Forestry Commission made huge mistakes when, years ago, it created conifer plantations of Norway Spruce, Corsican Pines etc, in Rockingham Forest. Conifer crops failed or developed unforeseen problems, they were unpopular with the public and had little or no benefit for biodiversity. When conifers are felled there are real opportunities for landscape and biodiversity gain with consequent public approval. It is a great shame that Forestry England are failing to maximise these potential benefits on the Public Forest Estate.

We believe there is a danger of repeating the mistakes of previous experiments with, for example, Serbian Spruce. This is a species endemic to the Drina River valley in western Serbia, and eastern Bosnia and Herzegovina, with a total natural range of only about 60 ha, at 800–1,600 m altitude. So the species comes from 10 degrees further south and 3000 feet higher than Fineshade. There are similar risks with Oriental Spruce whose native range is the Caucasus and northeast Turkey. These species will contribute almost nothing to the biodiversity of the woods and, like all conifers are likely to be unpopular with the public.

We note that the online consultation asks only the most general direct questions. If there were a direct question such as: “Do you approve of the policy to replace Fineshade’s conifer plantations with new conifers”, there would be sure to be almost unanimous opposition.

### **Plans for squirrel control**

We are puzzled by the planned action to be taken to offset damage to trees caused by Grey Squirrels. “Norway spruce will be retained in existing stands, and Serbian and Oriental spruce used as a mixture in new stands, as their cones provide a food source for squirrels, which helps reduce the level of damage.” This strategy could be classed as diversionary feeding, which has a very dubious validity. Providing even more food for the non-native Grey Squirrel is only likely to increase the population further – it is often argued that it was precisely the planting of conifer plantations that helped the species get so out of control in the first place. We believe that squirrel control is a far better answer and there appear to be two methods available. One is the new type of humane traps that have become available. But a far better solution would be the re-introduction of a natural native predator, the Pine Marten. We would welcome and support the extension here of the scheme being trialled by FE and the local Wildlife Trust in the Forest of Dean.

## **Plans for recreational provision**

I am very concerned that the plan does not give Forestry England's recreational objectives in any detail for the period 2019-2028, let alone for the longer term. While a great deal of care and attention has been given to the management of trees with detailed proposals of, for example, felling plans for particular areas of the wood, there is no equivalent for FE's thinking for recreation.

On page 11 there is a vague: "provide a wider range of services and facilities on site", but no details are given about how this will be achieved. In section 2.3 the plan describes the current position, but in very limited detail, especially for Wakerley and Southwick woods. For example, there is no mention of the very high level of use of Wakerley by cyclists, no explanation of why Wakerley toilet block is no longer open and maintained, no explanation of policy in relation to charges for car parks. There is no mention of the public rights of way through all 3 of the sites.

The plan is deficient in that it does not set out a strategy for how any increase in visitor demand will be handled. It would be good to see a prediction of the likely visitor numbers for 5 and 10 years' time and how FE intends to deal with these. Friends of Fineshade have consistently made the case that Fineshade is at carrying capacity, not only because of limited parking space but also because of the restricted access to the site from the A43. The plan rightly says of Fineshade: "recent car park improvements have helped cater for the growing visitor demand on weekends and during holiday periods." However, in previous years there have been occasions when Fineshade has been dangerously overwhelmed by excessive numbers of vehicles because of events promoted by the recreation side of FC. More recently, residents have been informed that such events will not be repeated. Is there is a policy in place relating to this? If so, why is it not made clear in this Forest Plan? What events and attractions do the recreation team see as suitable for Fineshade? And what would be the effect of providing more services and facilities at Fineshade?

Given a likely increase in demand for general visitor access, it would seem sensible to try to divert some visitors away from Fineshade to the carpark and toilet block at Wakerley. However, in conversation during the drop-in event we learned that FE have the immediate intention to down-play cycling in Wakerley by no longer maintaining the marked cycle trails and removing the signage. This means that over the past few years in Wakerley Wood FC/FE have:

- spent resource creating and promoting cycle trails,
- had no will or ability to control numbers and type of use,
- found they had no budget to maintain trails,
- realised they were failing in their H&S obligations
- simply intend to walk away from the problems they have created.

There can be few better examples of lack of strategic planning by the recreation arm of FE.

It is a pretence to suggest that FE have consulted on plans for the three Fineshade woods when no plans, short or long term, are presented for recreation provision in the future. This is arguably the very area that has the most impact on the general public and attracts the most interest. It is particular concern to the residents of Top Lodge, Fineshade.

## **Plans for enhancing public access**

On page 16 of the plan we read "Southwick Wood is a leasehold woodland which does not permit public access under its lease, any public access is limited to designated public rights of way that cross the site." There are two principle public rights of way running north-south

and they are not connected so it is not possible to walk a circular route through Southwick Wood. The plan's management objectives (page 5) include an aspiration to enhance public access where possible, but there are no proposed details of how this could be done. One possibility would be to work with the landowner of Southwick Wood to renegotiate the lease so as to provide a permissive path linking the rights of way along the existing forest road. This could be achieved without allowing any off-path permission but it would allow FE to meet its aspiration for increased public access, while allowing the public to experience some of the most attractive sections of the woodland.