Scoping a New Forestry Plan for West Tyrone Forests and Woodland

Comments by

Northern Ireland Environment Link

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Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 62 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be happy to do so.

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NIEL welcomes the opportunity to engage with Forest Service on a Forestry Plan for the West Tyrone Area. What follows below are a few general comments in relation to this consultation. We would therefore endorse the more specific comments submitted by the Woodland Trust.

General Comments

Forestry management in Northern Ireland is guided by the Forestry Act (Northern Ireland) 2010, which includes a duty to manage and develop forests in a way that contributes to the protection of the environment, biodiversity and the mitigation of, or adaptation to, climate change. Guidance on forestry management is also given through the UK Forestry Standard (UKFS).

Forestry occupies approximately 111,000 ha, or 8% of Northern Ireland's land mass (in 2013), of which 55% is managed by the Forest Service and 45% by the private sector. The Northern Ireland Forestry Strategy (Forest Service, 2006) included an aim to double woodland cover in Northern Ireland over the next 50 years, predominantly through the transfer of land from agricultural use to forestry. Achieving this target would require conversion annually of over 1,700 ha of open ground to woodland, well in excess of the current rate of 500 ha per annum. Currently, Northern Ireland is not capturing the full array of benefits that could be derived from forestry expansion. Tree planting in appropriate locations is therefore important.

Climate Change

As the UK Committee on Climate Change Report (2019)[1] highlights, Northern Ireland is lagging some way behind the annual afforestation rate required to achieve its expansion target. The Report also recognises that the Land Use, Land-use change and Forestry sector is a net emitter of carbon.[2] Given the multiple benefits that woodland provides to society, Net emissions from the land use, land-use change and forestry (LULUCF) sector were 0.3 $MtCO_2e$ in 2016, with a total increase of 0.12 $MtCO_2e$ between 2008 and 2016. The sector accounted for 1.4% of total emissions in Northern Ireland in 2016. Emissions from LULUCF have increased by 32% since 1990. Unlike the rest of the UK, the LULUCF sector in Northern Ireland is a net emitter rather than a carbon sink. This is due to much lower forest coverage in Northern Ireland (8%) when compared to the UK as a whole (13%). Appropriate afforestation and restoration of peatland are highlighted as opportunities to help deliver NIs contribution to

[1] https://www.theccc.org.uk/publication/reducing-emissions-in-northern-ireland/
[2] https://www.theccc.org.uk/wp-content/uploads/2019/02/Reducing-emissions-in-Northern-Ireland-CCC.pdf

meeting the UKs emission reduction targets with peatland restoration measures potentially delivering around 0.3 $MtCO_2e$ of abatement in Northern Ireland.

Habitats and Species

Changes to land use and the promotion of a particular land use, such as forestry, will have implications for other functions of land. Inappropriately sited woodland expansion in the past has had, and continues to have, a significant negative impact on internationally important habitats and species, and pressure is growing to plant on marginal farmland of high conservation value. Not only is this hindering emissions reduction targets and affecting the delivery of ecosystem services, but it is also contributing to the ongoing declines of priority species which depend on open ground habitats. We welcome the inclusion of 'Protecting Habitats and Species' within the scoping report. However, the report would need to ensure that full consideration is given to all potential priority species including listed breeding waders in the area. We urge Forest Service to commit to managing and restoring Forest Service sites in a sustainable and appropriate manner for the benefit of people and nature.

Peatland

Forest Service manages an estate extending to 75,279 hectares. This includes 35,810 hectares on peat soils with a depth greater than 50 cm. Some 28,421 hectares of planted forest is on peatland habitats, with the majority of this on blanket bog, making forestry one of the most significant land uses of peatland in Northern Ireland[3]. Forest Service will therefore have a key role to play in the preservation and restoration of Northern Ireland's important peatland habitats.

Peatlands are highly valuable habitats that support a range of plants and animals, act as major stores of soil carbon, and provide several important ecosystem services benefits; including carbon storage and sequestration, water regulation and flood risk mitigation. The State of Nature report for NI (2016) points out that only 8% of lowland bog and 15% of upland bog in NI is considered intact. The imperative to protect and restore peatlands is heightened given the future inclusion of degraded peatland in the UK emissions inventory. This will add 9% to Northern Ireland's total emissions and further undermine the pursuit of 35% emissions reductions by 2030. Peatland protection and restoration should therefore be prioritised.

[3] Mellon and Allen (2015) Options for the restoration of afforested peatlands in Northern Ireland

The afforestation of blanket bog and other peatlands has a significant detrimental effect on these habitats, both through the drainage of the peatland to support the tree crop and the evapotranspiration of the developing trees. These processes can result in a significantly reduced water table and cause compaction and subsidence of the peat surface. The use of significant quantities of fertilisers, the shading effects of canopy closure and deposition of needles are also key factors which impact upon bog vegetation, leading to degradation[4].

Whenever trees are felled there is a presumption in favour of restocking. However, for woodland on deep peats, the greenhouse gas and wider environmental implications of future management are more significant than on other sites. Recent research indicates that a negative net greenhouse gas balance may occur from restocking on deep peat where tree growth is poor, even if there is no significant soil disturbance from cultivation[5].

The scale of peatland restoration in Northern Ireland must be increased so that the benefits and services provided by functioning peatlands are realised on a landscape-scale. Removal of forestry on areas of deep peat should be considered and policy should ensure sites suitable for afforestation are carefully considered to minimise unintended negative consequences.

Interventions to support peatland restoration within the Forest Service Estate (and beyond) are required to fulfil the duty of the Forestry Act (Northern Ireland) 2010 to promote sustainable forestry. In the Act forestry is defined as *"the management and development of forests so as to contribute to the protection of the environment, biodiversity and the mitigation of, or adaptation to, climate change".*

Furthermore, a new government policy on peatlands is long overdue. 'Conserving Peatland in Northern Ireland' (1993) should be revisited and extensively revised.

[4] Forestry Commission Scotland (2000) Forestry and Peatland Habitat: http://scotland.forestry.gov.uk/images/corporate/pdf/peatland-habitats-supplementary-guidance-june-2016.pdf

[5] Morison, J. et al (2010). Understanding the GHG implications of forestry on peat soils in Scotland. Forest Research, Farnham.

Regional Strategic Land Policy

In this context, woodland creation should consider the sensitivities of landscape change and the cultural associations that landscape evokes: new, appropriately-sited woodland, can provide obvious environmental benefits but is not appropriate everywhere, such as on already established protected sites or peatland. Therefore, it is vital that government manages land use change in a strategic and joined-up manner. In 2016, the Land Matters Task Force secured cross-sectoral and political support for the development of a Northern Ireland Land Strategy to help address the dilemmas arising from managing competing land uses. Government should seek to progress this policy as a matter of urgency. This call is backed by the UK Committee on Climate Change Report (2019)[6] for NI. The report identifies the need for *'a strategic regional land management policy to determine the most appropriate use of land'.*

The West Tyrone Forestry Plan

- Carefully considered woodland creation should be prioritised to contribute to the creation of 60,000ha of woodland by 2050, supporting the NI Executive target of 12%.
- Any future Forestry Plan for the West Tyrone Area should include a commitment to protecting and restoring the peatlands within the area's boundary.
- Forest Service should avoid establishing new forests on soils with peat exceeding 50 cm depth, and on sites that would compromise the hydrology of adjacent bog habitats. Restocking should be avoided on deep peatland in preference for restoration of peatland habitats. We welcome the commitment to identify and prioritise areas of afforested peat for restoration in West Tyrone.
- Where restoration to open peat forming habitats is not possible, there should be a commitment to reduce loss of the carbon stock and maximise any potential for carbon sequestration.
- Any forest expansion should consider native broadleaf woodland as stated in the NI Forestry Strategy.
- An assessment of woodland assets in the area should be undertaken to provide baseline data upon which to base future forestry activities and decisions. For example, surveys of existing sites to discover where the hot-spots of invertebrate biodiversity are located would help prioritise actions.

[6] https://www.theccc.org.uk/publication/reducing-emissions-in-northern-ireland/

- Priority should be given to linking and therefore protecting small fragmented areas of ancient and long-established woodland through native species and high-quality hedgerow planting.
- The Plan should recognise and support riparian planting for flood alleviation and water quality purposes.
- Future management of rides, glades and edges is critical for maximising biodiversity benefits from woodlands. Such provisions should be considered early in the woodland design process.
- The Woodland Expansion Advisory Group (2012) in Scotland identified innovative options for fostering integration between sectors to ensure that woodland offers multiple benefits across a variety of sectors, for example, the use of woodlands as shelter belts for grazing livestock, as riparian woodlands to reduce water pollution, or as silvopastoral agro-forestry.
- The Plan should promote linking disconnected areas of woodland to increase the resilience of woodlands and increase access provision for local communities.
- Maximising the recreational and amenity value of the area should be central to the Plan. Adequate infrastructure and recreational facilities will foster community development and enable the full potential of the area to be realised. Tourism NI and Outdoor Recreation NI are key stakeholders who should be consulted to bolster this aspect of the Plan.
- The Plan should recognise the potential for community asset transfer. Such an approach can harness community energy and creativity and enable the full potential of the area to be fulfilled.
- Consideration should be given to the establishment of a steering group to engage stakeholders, including statutory and non-statutory landowners, in the development and implementation of a robust Plan. This would enable participation of stakeholders who can play a role in delivery of the Plan and provide evidence and knowledge on which to base objectives and desired outcomes. A steering group would also bring clarification to the action / objective partners, allowing for cohesive monitoring and success measurement.
- Forest Service should consider undertaking a natural capital assessment to ‘value’ the goods and services provided by natural assets such as trees and peatland. This would align with the government’s current natural capital policy driver and provide a strong case for the further protection, enhancement and expansion of forests in NI.

- Enhancing landscape - Small fragmented areas of native woodland, in particular ancient and long-established, which are small in size (less than 1Ha) are at serious risk from the ever growing numbers of tree diseases and climate change. These areas of woodland, in particular in designated areas, need to be the focus of attention for woodland restoration and establishment, to buffer, expand and extend these isolated woods.
- Water quality – NIEL welcomes the inclusion of a section on water quality. We believe however, that Forest Service need to increase their support of riparian native broadleaf planting and native buffering of all conifer plantations to mitigate against negative impacts and realise positive outcomes in flood alleviation and water quality.
- With ever increasing numbers of deer we need to take action to manage deer numbers and avoid putting woodlands under greater pressure, in particular our already fragmented and vulnerable ancient and long-established woods.
- Forestry drainage put in place in the 60's/70's causes major issues of discolouration and turbidity leading to an impact on river water quality and the habitats associated with it. Wooden leaky dams may help to slow the flow of water through these drains to reduce the impact on the rivers.
- Forest Service should ensure that any PAWS restoration work aligns (at the very least) to the standards set out in UKFS and UKWAS. The Forest Service commitment of restoring 10% of PAWS should not be the upper limit nor used to rule out restoration of PAWS areas.

Concluding Comments

Forests are multi-functional spaces providing a range of goods and services to society. For example, woodland offers recreational opportunities with associated health and well-being benefits, employment creation through sustainable forestry, carbon sequestration to facilitate delivery of greenhouse gas reduction targets, renewable energy through biomass production, water storage and flood alleviation, promotion of biodiversity, as well as offering educational experiences.

The West Tyrone Area Plan refers to important issues needed to realise the full benefits of forests and woodland areas. However, clearly defined objectives and interim targets are required to measure progress and, where appropriate, adapt actions during the Plan period. A coordinated multi-agency outcomes-based approach to delivering interim targets and

objectives will enable progress to be monitored and increase the prospects of successful Plan outcomes.