

Operations Note 043

15 February 2018

Principles for afforestation on or near priority habitats

Purpose

This Operations Note is published to clarify the principles to be adopted when considering afforestation on or near priority habitats (as defined by Section 41 of NERC Act 2006).

Please note that this is a restatement of existing principles and does not present a change in policy and is published to aid consistency of decision making when proposing afforestation in such locations.

Background

There are approximately 1.1 million ha of non-woodland priority habitats in England, but only a small proportion – approx. 440,000ha is capable of supporting woodland, (the rest is too wet or too salty). Non-woodland priority habitats are a scarce resource and a key component of our woodland networks and resilient landscapes, hence the policy priority in the England Biodiversity Strategy to maintain or restore them.

The sensitivity mapping carried out to inform the Environmental Impact Assessment (EIA) threshold changes in 2017 showed that around two million hectares of land in England is 'low risk' i.e. it does not contain any priority habitats or other sensitive features, such as prime agricultural land.

The Low Risk map exists for the whole country and afforestation proposed in these areas is likely to follow a simpler and faster regulatory path. Areas with priority habitats are listed as 'high sensitivity' on Opportunity Maps and maps of Low Risk areas. Woodland creation may still be possible in the high sensitivity areas, but applications will need to consider fully the sensitivities of the site in the woodland design.

The EIA process, from screening to statement, gives a transparent mechanism for demonstrating how proposals have considered the sensitivities of a site. The Environmental Statement process provides an opportunity to refine or amend any area incorrectly specified as priority habitat on the inventory.

The Forestry Commission needs to balance economic and environmental priorities while meeting regulatory requirements. The principles below summarise and provide guidance as to how this can be achieved.

Principles underpinning afforestation on or near priority habitats

- i. All proposals have to meet the requirements of the UKFS and also comply with the various regulatory requirements relating to forestry.
- ii. There is a general presumption against afforestation of non-wooded Section 41 priority habitats (see table below).

Table 2a.1 Priority habitats mapped into the new single habitats' inventory for England

Priority habitat	
Blanket bog	Lowland raised bog
Coastal and floodplain grazing marsh	Maritime cliffs and slope
Coastal saltmarsh	Mountain heath and willow scrub
Coastal sand dunes	Mudflats
Coastal vegetated shingle	Purple moor-grass and rush pastures
Deciduous woodland	Reedbeds
Limestone pavements	Saline lagoons
Lowland calcareous grassland	Traditional orchards
Lowland dry acid grassland	Upland calcareous grassland
Lowland fens	Upland hay meadows
Lowland heathland	Upland heathland
Lowland meadows	Upland flushes, fens and swamps

- iii. Applicants can consider changes to existing priority habitats, which may include planting broadleaves and mixed woodlands on poor quality / lower value sites. Whether this is appropriate will be dependent on site-specific characteristics and the status of the habitats in question, see principle **iv**. NB: some afforestation proposals will not be appropriate for other reasons e.g. existing heritage features and designed or protected landscapes, which would be impacted by afforestation.
- iv. Applicants must engage with Natural England to consider any proposals which include potential changes to existing priority habitats that would be regarded as a potential loss or damage. Natural England, as the Government's statutory adviser on the natural environment, will need to formally give advice to the Forestry Commission on the impact of loss of any habitat included on the S41 Priority Habitat inventory. For example, there may be sites where the extent of a priority habitat has been incorrectly mapped, or where the condition of priority habitat has degraded to such an extent that the ecological features present are no longer consistent with the definition of the mapped priority habitat. In such cases, NE may remove all or a proportion of the site from the Priority Habitat Inventory.
- v. Where afforestation is appropriate on a site, the planting design should address existing biodiversity interest of a site by using a hierarchy of (a) avoiding loss

(with the position of open space), (b) mitigating impacts (through species choice, tree spacing etc.), and (c) compensating for unavoidable loss.

- vi. Any afforestation on priority habitat should adhere to the definition of native woodland given in the practice guide '*Managing ancient and native woodland in England*', i.e. be predominantly native broadleaves (including productive) but can include a proportion (20% max) of non-native species. Additional naturalised broadleaved species can be included as part of the native component to improve the future resilience of the new woodland (up to 20%).
- vii. Afforestation should, as a minimum, result in no net loss of biodiversity. Where public funds have been provided, it is reasonable to require a net gain as a result of afforestation.
- viii. The standard metric for assessing net gain or loss of habitat is currently a simple area measurement (hectares). From an EIA perspective, in order to assess the potential biodiversity impact on a site it is important to understand quantity and condition status of the habitat, with the key issue being the need to provide adequate information to allow a reasonable decision to be made.

Sources of further advice

Revised EIA guidance can be found on the Forestry Commission website:
<https://www.forestry.gov.uk/forestry/BEEH-AMDDDB3>

Versions

Version 1 issued - 15 February 2018