



Department of Agriculture and Rural Development (DARD) Estate Management Strategy 2011-2021

A response from RSPB Northern Ireland November 2011

Summary

- Estates branch should include ‘contribute to halting and restoring of biodiversity decline on our estate’ within their aims and objectives
- As part of the strategic management of the DARD estate, reports should be produced annually which outline progress towards meeting aims and objectives
- A set of headline policies and objectives would be beneficial, but a ‘one size fits all’ model would be inappropriate due to the divergent nature of the estate
- Both qualitative and quantitative information will be required for monitoring purposes
- Any state or public land that is to be disposed of or transferred into other arrangements, such as leasing, should have the biodiversity and other public benefits secured
- Forest Service has a dominant role in NI in terms of woodland area, supply of softwood timber and the type of woodland management it pursues. We would suggest this needs rebalancing, in terms of the public benefit objectives it has and produce
- Work to improve the sustainability of the DARD estate is vitally important. Reducing the estates carbon footprint is valuable, but the RSPB believes that sustainability encapsulates positive action that should also include improving biodiversity

Introduction

RSPB Northern Ireland welcomes the opportunity to respond to this consultation on the development of a new Estate Management Strategy 2011-2021 and look forward to subsequent dialogue on more detailed proposals. We believe there are significant opportunities to improve the sustainability and environmental goods provision of the DARD estate.

Consultation Questions

Question 1: Can you suggest any other aims and objectives that DARD could set for the management of its estate?

The RSPB agrees with the general principles set out in the aims and objectives of the proposed strategy. However, as the biggest land owner in Northern Ireland, the DARD estate should also have the aims and objectives to halt and restore biodiversity loss by 2020. This timeframe has been set by the United Nations Convention of Biological Diversity¹ and fits well with the duration of the Estate Management Strategy 2011-2021. The RSPB has responded to the new targets on biodiversity by starting a new campaign called ‘Stepping Up for Nature’². This campaign asks government and civil society to ‘Step up’ to the challenge of meeting the 2020 biodiversity targets to avoid rapid and dangerous declines in our most threatened species and habitats. The RSPB therefore recommends that ‘Step Up’ and include a new aim of ‘contribute to

¹ <http://www.cbd.int/2011-2020/goals/>

² <http://www.rspb.org.uk/stepup2020/>

halting and restoring of biodiversity decline on our estate' should be added to the aims and objectives of the strategy.

Although international agreements are vitally important, there are significant local policy drivers that can deliver positive change. The Executive's Programme for Government identifies sustainability as a cross-cutting theme, and states that building a sustainable future will be a key requirement for our economic, social and environmental policies and programmes. All aspects of the DARD estate management should now be guided by new biodiversity duty, enacted by the Wildlife and Natural Environment Act (Northern Ireland) 2011. Clause (1)³ of this legislation states that it is *'the duty of every public body'*, to *'further the conservation of biodiversity so far as is consistent with the proper exercise of those functions'*. One of the major functions of DARD is to ensure the conservation and enhancement of the environment, therefore building biodiversity aims and objectives into the DARD estates business model will be a win-win scenario. This should take account of any already existing estate management strategies which should streamline delivery and prevent duplication.

Almost 97%⁴ of the DARD estate is made up forested land managed by Forest Service (FS). Forested areas in Northern Ireland (NI) contain 73 Areas of Special Scientific Interest (ASSIs) and 26 Special Protection Areas (SPAs) as well as delivering other eco-system services such as carbon sequestration and timber production. There are also a number of National Nature Reserves ((N)NRs) which have their own management objectives attached. The RSPB is supportive of the new Forestry Act (Northern Ireland) 2010 and the general duty of *'promoting afforestation and sustainable forestry'*. We are also supportive of clause (1)-(3) (b) which commits FS to 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.'* The United Kingdom Woodland Assurance Standard (UKWAS) and UK Forestry Standard (UKFS) will also play a role in contributing to the improvement of the forested estate. The Estate Strategy should therefore seek to include these already existing targets and align them with the 2020 targets for reducing biodiversity loss.

Forestry policy is tightly regulated in NI; however the RSPB remains concerned that FS will not be subject to a felling regime like that proposed within the Forestry Act for private woodland owners. This poses an unnecessary risk to biodiversity and if managed incorrectly could undo much of the good work and policy framework already in place.

Question 2: Do you agree that estate management issues should form part of the strategic management of our Department?

As the department responsible for the rural environment and the biggest landowner in NI, the RSPB believes that DARD should lead by example when it comes to managing their estate. The

³ <http://www.legislation.gov.uk/ni/2011/15/section/1/enacted>

⁴ 75400ha out of 78000ha is made up of FS land

RSPB therefore sees it appropriate that estate management should form part of DARD strategic development. This approach should be reported on annually and work towards meeting achievable targets. Any estate monitoring programme already existing within the executive agencies of DARD (FS and Rivers Agency) should be used to inform this process e.g. the woodland inventory required as part of the new Forestry Act.

The RSPB believes that stakeholders should be consulted on strategic decisions affecting the management of the DARD estate. All land held by the state, not just DARD, needs to be managed for public benefits. This includes meeting NI's commitments under the biodiversity strategy and UK, EU and international wildlife obligations as mentioned above. If any state or public land is to be disposed of or transferred into other arrangements, such as leasing, then the biodiversity and other public benefits present have to be secured. This includes on both designated and un-designated wildlife sites, and measures put in place to improve the condition and status of priority habitats and species through restoration and targeted management. It also covers biodiversity survey and monitoring as well as wildlife restoration and management for priority species, priority habitats and designated sites. The nature conservation potential on state land cannot be avoided and must not be offloaded. Management of current state lands for existing and enhanced public benefits, including priority species, priority habitats and designated sites, has to be secured into the future, no matter who owns, leases or manages this land.

Question 3: Do you agree that it is necessary to have policies and objectives to ensure a consistent approach to estate management issues?

The RSPB believes that a set of headline policies and objectives would be beneficial to ensure a relative amount of consistency. As referred to above, the RSPB believes that it would be appropriate to include an objective to meet the 2020 biodiversity targets, further embedding this into the DARD business model. This would allow DARD to take the lead amongst other government departments and contribute to the cause of reversing biodiversity decline within the NI Executive.

However, the RSPB **does not** believe that policy and objectives should be forced inappropriately on the different aspects of the DARD estate. This 'top-down' approach is likely to alienate the Estates Branch of DARD instead of empowering those they wish to influence. Due to the diverse nature of the estate, it would be difficult to ensure consistency across the board as different estates require different outputs. A one size fits all approach would be inappropriate. The RSPB would suggest the different aspects of the DARD estate e.g. RA, CAFRE, FS etc decide how they will meet the headline policies and objectives and submit this to DARD and stakeholders for scrutiny. This will allow relative autonomy amongst the different estates allowing already existing measures to be included towards meeting the headline asks.

Question 4: Do you agree that there is a need to monitor centrally how policies and objectives are applied or can you identify any other ways the Department can monitor the application of policies and objectives?

The different aspects of the DARD estate should report annually on their departmental functions. This is an important aspect of departmental work as it helps keep government accountable and departments are able to show progress towards meeting targets. Estates policy objectives should seek to monitor the economic, social and environmental status of estate management to ensure they are delivering significant public benefits. The RSPB believes the easiest way to monitor how policies and objectives is for different estates to include a section on 'estates' within their annual reports. This can then be collated by estates branch and included in an DARD estates annual report.

The RSPB also believes that monitoring should not only be quantitative, but also qualitative in nature. Environmental monitoring of this type, required as part of improving biodiversity, will be vital so as to measure trends and progress on meeting achievable goals.

Question 5: Can you identify any other ways to make our Corporate Governance arrangements more robust?

As mentioned in Question 2 above, if any state or public land is to be disposed of or transferred into other arrangements, such as leasing, then the biodiversity and other public benefits present have to be secured. This includes on both designated and un-designated wildlife sites, and measures put in place to improve the condition and status of priority habitats and species through restoration and targeted management. **Stakeholders and other government departments should be consulted before any leasing and disposal arrangements are finalised.**

The RSPB also has concerns around any tendering process that would follow announcements on the disposal or leasing of land in the future. The RSPB believes that scores during any tendering process should not be based on economics alone but should consider social and environmental aspects. Those leasing or buying any state land should still have to apply state law in the management of sites, specifically those with high environmental value. The RSPB believe it would be prudent of estates branch to investigate the feasibility of developing such a scoring system to ensure the true sustainability of future agreements.

From a Forestry point of view, the RSPB considers that it is more important *how* NI's state forest lands are managed for public benefits, rather than *who* owns them. Northern Ireland's woodland resource is a legacy of previous forestry policies, some of which encouraged the overplanting of important blanket bog and semi-natural grassland habitats, as well as promoting the removal of, and damage to native woods. These earlier policies favoured timber production, rather than a range of public benefits such as wildlife, access or the protection of soil, water quality and the historic environment. The more progressive current forestry policies,

must address these 'legacy issues' by rectifying wildlife damage, including through management and restoration for priority wildlife species and habitats on the state forest.

The extent of this estate dates mostly from earlier more limited forestry policy objectives, and is not the optimal mix of woodland types, quality or location to fully deliver public benefits. Despite attempts since the 1990s to restructure state forests and partially modify management practices, with a strong emphasis on landscape and recreation with some good quality but limited biodiversity works, there is still more that could and should be done to make the FS land fully deliver public benefits. We note the sustainable multiple benefit forestry commitments in the Northern Ireland forestry strategy⁵ the UK Forestry Standard which is applied by FS to all private, public and state woodland planting, felling and management, and the duties to sustainable forestry and biodiversity under Section 1 of the Forestry Act (Northern Ireland) 2010⁶. We also note the time lag between issuing government forestry policy and tree growth and the development of woodland ecosystems. We have concerns about the effectiveness and uptake of policy delivery mechanisms on state, public and private land to produce a range of public benefits in a sustainable manner.

The RSPB remains concerned about how NI's biodiversity commitments and targets are embedded and translated into forest management on the state land, as well as within private and other public woodland. It is important that management of NI's state forestry protects and enhances biodiversity, whether this is under direct or indirect state ownership.

The RSPB is concerned about potential separation of DARD and Forest Service's statutory duties to biodiversity and sustainable forestry from their function of managing the state forest. This would be a concern in any programme of land sales or leases. The current areas of state forest land must be managed better for woodland and non-woodland wildlife, no matter who owns or leases it in future. This means continued sensitive forest operations for hen harriers, red kites, red squirrels, enhanced restoration of priority peatland habitats for biodiversity and climate change mitigation benefits, and the management and increased restoration of ancient and native woodland sites.

Question 6: Do you agree that we should hold DARD's estate information on a single system to better manage our estate?

The RSPB believes that it would be highly dependant on the nature of the information. If the information was purely quantitative then this would be a commonsensical approach. However if the information was also qualitative it would make this difficult due to the divergent range of information. We would therefore request further information on the range of data that would be expected to be collated and housed in a single system.

⁵ Northern Ireland Forestry – a strategy for sustainability & growth (2006):

<http://www.dardni.gov.uk/forests-service/strategy-for-sustainability-growth.pdf>

⁶ <http://www.legislation.gov.uk/nia/2010/10/contents> & see Forest Service's *Delivery Plan* related to biodiversity and sustainable forestry duties: <http://www.dardni.gov.uk/forests-service/forest-service-pdf-plan.pdf>

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Question 7: What are your views on our proposal to include estate management objectives, where appropriate, as part of the performance management system for staff?

This would only be appropriate for those that are involved at a strategic level in managing the DARD estate.

Question 8: Can you identify any other ways in which we could make best use of our assets?

Northern Ireland's small and isolated native woodland remnants need to be brought into better ecological condition through positive management, as well as buffering and expansion. The state forest has a key role in restoring its native woodland sites at a more ambitious scale, in an effective and sensitive manner. This includes ancient and native woodland sites which are currently overplanted with recent non-native conifer plantations⁷, as well as looking after their existing native woods. This needs to be done to meet Northern Ireland's biodiversity commitments for priority native woodland habitats and species⁸.

Forest Service has a dominant role in NI in terms of woodland area, supply of softwood timber and the type of woodland management it pursues. We would suggest this needs rebalancing, in terms of the public benefit objectives it has and produces. This means more radically altering the woodland types, silvicultural approaches and systems it uses, as well as how increasing the amount of peatland and native woodland habitats it restores and then manages in good ecological condition. As well as having direct public benefits this would also have an important influencing role to other woodland owners and managers, which should be backed up by outreach support on woodland management and planning, as well as working with DARD colleagues on delivery of land management grants. Forest Service, both as a regulator and forest manager, needs to promote an approach of dealing with plant health issues that considers impacts on, and opportunities for, biodiversity and other public benefits.

It may also be prudent for DARD to partner with other organisations in utilising assets effectively and efficiently. The RSPB, for example, spends only 9p in every £1 on administration, ensuring as much as possible goes to front line conservation effort. The RSPB has a long and established relationship with the DARD estate on several key sites, from habitat management on Lough Beg, access rights for red kite re-introduction at Castlewellan Forest Park to supporting CAFRE in the provision of community education at their Greenmount and Enniskillen Campuses. This partnership work is paramount for the conservation of species and habitats in NI.

⁷ 'PAWS' plantations on ancient woodland sites.

⁸ See *Northern Ireland Native Woodland Definitions & Guidance* (2007) produced by the Northern Ireland Native Woodland Group: <http://www.doeni.gov.uk/niea/committees-34> and description of the four native woodland habitat action plans 'HAPs':

http://www.doeni.gov.uk/niea/biodiversity/biodiversity_delivery_groups/northern_ireland_native_woodland_group.htm

Question 9: Do you agree that sustainability and carbon reduction proposals should be included in our Estate Management Strategy?

Yes. Due to the nature of the estate, and our comments above, this should be a major priority. Already existing mechanisms such as the Forestry Act should be used when considering carbon reduction, but this should not be the only driver. Although vitally important, the RSPB believes that sustainability is not just about carbon and energy use.

The RSPB believes that the DARD estate could also be used to demonstrate best practice for agri-environment schemes in the future. Demonstration sites, either run by DARD or interested third parties would be used to train farmers and help improve compliance and therefore sustainability. This would help DARD meet several targets across several policy areas, including estate management.