Petersfield Heath Management Plan 2017-2021 Response from the Friends of Petersfield Heath Main considerations:

1.Lack of Consultation

We are disappointed there has been no consultation with the Friends of Petersfield Heath during the production of the Management Plan 2017-2021 by CJH Agri-Environment Consultants.

As a result, this document appears to be largely driven by the archaeological interest, which we agree is substantial, but this has given rise to only passing reference to preserving or enhancing the ecology of the habitats present on the heath.

(See p.5 #3 "The approach adopted here is to concentrate on the accepted priority issue which is the archaeological sites").

Further to this we have identified *internal contradictions* in the Plan that will make it difficult to implement, for example, the map of phased barrow clearance work does not tally with the schedule. We strongly suggest the Plan is returned to the SDNPA for revision and improvement.

Whilst the new Management Plan accepts that the overarching document is the Management Strategy 2015 conducted by Dolphin Ecological Surveys, and whilst it proposes using the two documents in tandem, it has failed to emphasise the main recommendation made in the first document, namely:

2. The urgency of setting up a Steering Group that meets biannually to check management actions against objectives and make adjustments.

Without such a Steering Group, the FoPH is concerned that certain interests will override other, equally important interests. We have asked the PTC to establish this group in the past but have experienced resistance to the implementation of this key proposal.

We suggest the Steering Group could comprise: 2 FoPH, 2 Petersfield Museum, 2 Anglers, 2 PTC, plus the site manager and SDNPA local ranger. Its main purpose would be to create a 'sensitivity map' of the heath, showing plant, bird and animal populations, as well as archaeologically sensitive areas, and agree management action, as proposed in the Strategy (p.5).

3. The new Management Plan has also failed to recognise the importance of the designation of Petersfield Heath as a Site of Importance for Nature Conservation (SINC) or for its wildlife and wildlife potential.

Given the SINC designation, which was awarded on the presence of nationally scarce species chamomile and mossy stonecrop, any Management Plan for the site would normally include the results of a Phase 2 survey plus species surveys (bats, birds, invertebrates, mammals). These are required to inform future management for wildlife. Some data exists to show that seven species of bat (UK total species 17) use the heath for foraging. In addition, some rarer butterflies, such as marsh fritillary,

once used the heath but are no longer recorded. With positive management, these and other heathland species may be brought back.

4. Major impact on woodland and scrub habitats

Our main concern is that neither the Strategy nor the Management Plan appears to take into account the *degree to which woodland and scrub would be lost during archaeological excavations* (this ought to have been estimated by both consultants), or how much would *remain in deficit* following the discovery of 23 barrows on the heath.

After considering the planned works to reveal archaeological structures over the coming years, we estimate that more than 30% of the small amount of extant seminatural woodland on the heath will be lost in perpetuity.

This is a major change to both the landscape and habitats of the heath.

We therefore propose a halt to any further woodland management.

In addition, we recommend that some areas of existing woodland be allowed to *encroach* in order to provide continuity of cover for many species by creating wildlife corridors. (A key example is the birch growth on the perimeter of the cricket pitch). These two actions could help mitigate the overall woodland lost during the archaeology project.

The woodlands of the heath have been shown to be refuges for a range of species - birds, reptiles, mammals, amphibians and invertebrates. It is imperative, therefore, to retain all remaining woodland in its entirety, including the shrub and field layers, as well as dead and dying timber.

5.Implementation of the Management Plan

The Friends of Petersfield Heath would oppose any 'zoning' of management that would separate the three main interests (archaeology, ecology and amenity), as has been suggested in a preliminary walkabout (07.09.17).

Our reason for this is that *ecological interests can, and should, be incorporated into the management for both archaeology and amenity,* in order to avoid the compartmentalising of the habitats of the heath. (After all, nature suffers from compartmentalisation, but thrives on continuity and connectivity).

We therefore propose a number of projects that seek to enhance the wildlife potential of the heath.

6. Specific concerns and actions

On the understanding that ecological concerns can be addressed throughout, we propose:

(i)Amenity mowing

There is plenty of scope to increase the ecological interest of amenity areas by varying the mowing patterns undertaken by PTC and contractors. Three areas are immediately apparent:

- •Bank behind The Plump Duck and public toilets.
- •At least 3m width of the bank running along Heath Road, from the new gate entrance east to the copse.
- Wet grassy area close to the Sussex Road entrance to the Heath.

None of these areas is used for recreation. All would benefit from a relaxed mowing regime (two cuts/year, arisings removed). It would be interesting to see what wild flowers already exist in the seedbank in these areas and there could be an opportunity for plug-planting of further native species. Invertebrates would benefit from this varied structure of vegetation, and in consequence, so would insect-eating birds (robins, flycatchers, swallows, martins and swifts) and bats.

(ii)Barrow vegetation control and maintenance

Barrows that have been cleared were previously colonised, or have been recolonised by bramble, seedlings and/or bracken. This vegetation should not be flailed by mower, but brush-cut. It is essential that all arisings be removed, or else rank vegetation (more bramble, more bracken, plus dock and nettle) will establish, making the rotational maintenance harder and, in the meantime, giving an unkempt look to the barrows.

Long term, bramble can be eradicated only by a programme of herbicide use, and this needs to be discussed. The barrows could then be planted with tussock-forming, low-growing, acid-heath grasses, such as wavy hair-grass and purple moor-grass, and flowering plants, such as tormentil and heath bedstraw. When established, these species would require minimal management (some weeding). These low-growing plants would provide binding vegetation, keep the barrow shape visible and keep out rank vegetation.

Please note p.7 #6 of the Strategy, "Management of the vegetation on the SAMs to allow each individual barrow to be seen is important, but *does not mean adopting an intensive management regime* which would conflict with the ecological importance of these features". (Our italics).

(iii)Cricket pitch sward

Both the Strategy and the Management Plan point to an opportunity to establish chamomile in the short sward. This requires its' own action plan and budget.

(iv)Heather (Ling)

There are places on the heath where further seeding of heather (ling) would be desirable, and which would not affect the archaeological interest, including the fairway, the southeast corner of the heath, Music Hill and near The Little School. This could be accomplished as part of Heathlands Reunited, SDNPA.

(v)Heath bedstraw

This small community of plants has been annihilated from the area excavated for Barrow 19 and should be restored.

(vi)Dry hedging

Dry hedging would continue to be undertaken, using stray saplings and bracken arisings. In time these hedges will rot down and may not be replaced, since the timber for their maintenance will no longer be available. This habitat, even when decomposing, is useful for invertebrates and small birds, such as the wren.

(vii)Common ragwort

Common ragwort is *occasional* on the heath, with no more than 30 individual plants present. In accordance with Standing Advice (DEFRA Code of Practice 2003), common ragwort plants found growing within 50m of the boundary of Heath Road East, ie. adjacent to livestock farming, should be pulled up and disposed of off-site.

The remaining plants *currently pose no threat to livestock* and are a huge resource for many invertebrate species, including the cinnabar moth.

(viii)Bracken

Twice yearly bracken control can be undertaken by the FoPH and SDNPA Rangers, in accordance with DEFRA advice, in June and July. Whilst this does not eradicate the plant, this treatment can weaken its vigour, if judiciously followed, year on year.

7. New role for the Friends of Petersfield Heath

It is clear that, since we are recommending a hands-off approach to further woodland management, the role of the Friends will change. In accordance with the Strategy and the new Management Plan, we accept the proposal that our group should *provide a monitoring and surveying role in future*.

FoPH has a wealth of expertise that can be employed in the delivery of the new Management Plan, as well as in agreed actions outside the Plan. In addition to monitoring the extent of heather and other heathland plants, our members are engaged in bird and invertebrate surveys, with the data being fed into HBIC. With the possible recruitment of summer volunteers, FoPH can help remove arisings from a new mowing regime, help establish acid grassland on the barrows, and source further heathland species for plug-planting. We can work with the SDNPA to optimise heather establishment, using seed from other heaths via the Heathland Reunited initiative.

Similarly we can ask for help to establish chamomile on and around the cricket pitch.

8.Implications for the PTC

Some of our recommendation will save the PTC money, whilst others would have modest cost.

- Cancellation or variation of contract with Burleighs since we recommend a halt to their work to deliver further woodland clearing/management.
- Change to mowing regime alteration of contract mowing, to include removal of all arisings.
- Arisings possible need for composting facility on site or nearby.
- Professional species surveys (bats May-Aug; reptiles April September; breeding birds March August; invertebrates May October).
- •A change of wording will be required to certain aspects of the **Policy for the Grounds Committee**, viz: Trees and hedgerows; The Heath; Contractors.

Melanie Oxley & Richard Warton
Friends of Petersfield Heath November 2017