

Forestry EIA application guidance: Afforestation

This guidance is for anyone applying to the Forestry Commission (FC) for a 'stage 1' forestry Environmental Impact Assessment using the EIA afforestation application form (England). 'Stage 1' is the plain English used to describe Applications for Opinions, Basic Notifications and Full Notifications.

This guidance is designed to be read with the application form. You may wish to read this guidance in full prior to completing your form. Alternatively, if you only require guidance in relation to specific parts of the forms, simply skip to the corresponding parts of this guidance that elaborate on that part of the form.

If you have an approved Stage 2 Woodland Creation Planning Grant (WCPG) plan you only need to complete some of the questions in the form. Opportunities to skip questions by referring to sections of your existing plan are indicated in your application form and in the guidance below.

The EIA afforestation application form (England) can be found on the [GOV.UK website](https://www.gov.uk).

Part 1 – Applicant details

Use Part 1 to fill in the details of the person who has or who will have primary control of the land on which the project is being proposed. In most instances, this will be the land owner, leaseholder or a tenant.

If the person with primary control of the land has a Customer Reference Number (CRN) from the Rural Payments Agency or a Single Business Identifier (SBI) for their business or, please fill this in here. If not, leave these sections blank.

If you are completing this form as an agent of the person with primary control of the land, you should not insert any details relating to yourself or your business in this section.

Part 2 – Agent or woodland manager’s details

Use Part 2 to fill in agent details. If you do not have an agent, please leave this section blank. The agent or woodland manager is the person you have authorised to act on your behalf in relation to the proposal.

If the agent has a Customer Reference Number (CRN) from the Rural Payments Agency, please fill this in here.

You do **not** need to supply the Forestry Commission with an agent authority form to submit a standalone EIA ‘stage 1’ application for afforestation (i.e. the [EIA afforestation application form \(England\)](#)) on behalf of your client. However, you may require one if you are applying for other permissions or licences.

Part 3 – Property details

Please provide property details so the FC can identify the land where the project is being proposed.

Please provide an OS grid reference for the centre of your proposal area. You can obtain an OS grid reference using [the Forestry Commission’s Map Browser](#).

If you have a County Parish Holding (CPH) number issued by the Rural Payments Agency, please add it in this section. If not, please leave blank.

If you don’t know the local planning authority, you can find them through your local council.

Part 4 – Proposals on or affecting sensitive areas

Whether your proposal lies completely or partly within one of these ‘sensitive areas’ or on ‘low risk land’ will impact upon what threshold your proposal falls within.

Some thresholds allow for you, and the FC, to **presume** that the proposal will not be likely to have a significant effect on the environment (and therefore an EIA ‘stage 2’ Application for Consent, incorporating an Environmental Statement, is unlikely to be

required). However, this presumption is **not a guarantee**, and only provides a 'starting point' for the FC's decision.

All other proposals will be examined by the FC without any presumption of the proposal's effect on the environment.

The thresholds determine which statutory timescales apply, for the FC to respond to your EIA 'stage 1' application. For more information, see the threshold table for afforestation in Annex 1 of your form.

Forestry proposals within some sensitive areas and other statutory designations require a separate consent from the authorities responsible for those sites (for example Historic England in relation to Scheduled Monuments). Applicants must ensure that all necessary permissions are in place prior to starting any forestry works.

You can find out more about your key obligations on [Forestry project checks: Constraints](#). This tells you what actions you need to consider after running a [Land Information Search](#) in relation to individual constraints.

4.1 Is your proposal entirely on low risk land?

Use the [Forestry Commission's Land Information Search tool](#) to check for low risk land. When you run the search, low risk land will appear as a 'low risk area for woodland creation'.

You can see low risk land mapped in the wider area on [the Forestry Commission's Map Browser](#). The relevant browser layer is found under Data < Targeting and scoring < Low Risk Areas for Woodland Creation.

Only mark 'Yes' on the form if your proposal sits entirely within low risk land.

More information about low risk land:

Land identified as 'low risk land' is defined as land which is not any of the following:

- 'Sensitive land': Special Areas of Conservation; Special Protection Areas; Areas of Outstanding Natural Beauty; 'local' nature reserves (not designated by local authorities), National Nature Reserves; National Parks; Ramsar sites; Scheduled Monuments; Sites of Special Scientific Interest; the Norfolk Broads; and World Heritage Sites.
- Other constraints: areas of peat over 50cm deep; RSPB Important Bird Areas; Acid Vulnerable Catchments; 'local' nature reserves (designated by local authorities); common land; land grant funded within Higher Level Stewardship;

the best and most versatile agricultural land (Land Classes 1 – 3a); priority habitats (set out under section 41 of the Natural Environment and Rural Communities Act 2006); registered battlefields; and registered parks and gardens.

- If one or more of the above constraints are present on the land, it will not be identified as 'low risk land'.

The following should be considered when interpreting the low risk map:

- The map was developed primarily to identify land that is very suitable for tree planting. These sites are most likely to get a faster decision from the FC.
- It does not indicate a 'green light' for woodland creation within low risk areas, or a 'red light' for woodland creation outside those areas.
- National maps often do not capture small scale or local sensitivities, such as important areas of priority habitat not recorded on national datasets, non-designated heritage assets and Conservation Areas. You will still need to check for evidence of these.
- Even if your proposal is in a low risk area, you will still need to gather and assess site-specific evidence to make decisions about your woodland creation proposal.
- You should also consider sensitivities that are near to your proposal and will still require consultation even where your proposal itself is within low risk land.

4.2 Is your proposal on any of the following sensitive areas?

You must answer 'yes' or 'No' to each of these nationally important designations to declare whether your proposal sits within their area.

You can use the [Forestry Commission's Land Information Search](#) and [Defra's MAGIC Map](#) to identify these sensitive areas, with the following caveats:

- **Proposed SSSIs:** although Sites of Special Scientific Interest are mapped, proposed SSSIs are not;. If your land has been proposed as an SSSI then you, as the land owner, will have received communications from Natural England about the proposal. Declare the proposed SSSI here. If you have not received a notification from Natural England then you may assume that the land is not a proposed SSSI. Agents must check with their clients prior to making this assumption.
- **The Norfolk Broads:** are mapped as a National Park.
- **'Local' Nature Reserves:** The forestry EIA regulations list 'local' nature reserves that are not designated by local authorities as a 'sensitive area'. These are nature reserves that are designated by bodies other than the local authority, such as a National Park Authority or town or parish council. There are fewer nature

reserves that are in this category. They will be mapped on [Forestry Commission's Land Information Search](#) and [DEFRA'S MAGIC Map](#) as 'Local Nature Reserves'. If a search indicates a local nature reserve on your land, check [Natural England's Designated Sites page](#) to see whether its declaring authority is a local authority (such as a borough or county council) or otherwise (e.g. a National Park Authority). If the declaring authority is **not** a local authority, the local nature reserve will be considered a sensitive area.

Many of the sensitive areas require separate permissions from bodies other than the FC before works on those sites can start. Refer to [Forestry project checks: Constraints](#) to help guide you on what you need to do in relation to particular constraints. The applicant must ensure that all necessary permissions are in place prior to starting their approved forestry project.

4.3 If you have indicated 'yes' to any of the sensitivities listed in Part 4.2 please provide details of its features and of the reason for designation(s).

You can find details of designations on the relevant statutory body's web page. For example, SSSIs are listed on Natural England's [Designated Sites view](#).

If you are not sure who to contact, [Forestry project checks: Constraints](#) will give you further information.

4.4 If your proposal sits outside a sensitive area, does it still have the potential to affect the features of interest within a sensitive area?

The [Forestry Commission's Land Information Search](#) tells you when your proposal is within 500m of a constraint, including those that make up 'sensitive areas' (as listed in 4.2). If your proposal is within 500m of a sensitive area, you may still affect that sensitive area. Declare this in 4.4.

You should also consider sensitive areas that are further away if they are linked to your proposal in some way. This could be via a watercourse or because of the flight path of a particular bird species. If you are unsure, you can ask for advice from the statutory body that governs that sensitive area. A list of these is found on [Forestry project checks: Constraints](#).

4.5 If the site is a Site of Special Scientific Interest (SSSI), what is its listed condition?

Refer to Natural England's [Designated Sites view](#), where you will be able to find the listed condition for all SSSIs or ask your Natural England advisor.

For SSSIs that have multiple condition assessments across the site, tick all that apply.

Part 5 – Proposal size

5.1 What is the size of your afforestation proposal?

Tick the threshold in the table that applies to the area of trees (in hectares) that you intend to plant. This table matches the thresholds in the regulations and will help determine how the FC processes your EIA 'stage 1' application.

You should include open space within your proposal. The UK Forestry Standard recommends that well designed woodland comprises at least 10% open space. In most cases the FC would not expect more than 20% open space within an afforestation proposal.

You will be asked about adjacent projects in Part 7 so do not include adjacent projects here.

Part 6 – Proposal overview

6.1 Have you got an approved Stage 2 Woodland Creation Planning Grant (WCPG) plan?

Having an approved Stage 2 Woodland Creation Planning Grant (WCPG) plan will mean that you do not need to complete the entirety of the form, saving you time and unnecessary duplication. Questions that you can 'skip' are indicated as such on the form.

If you indicate yes to this question, please provide a copy of your plan when you submit your application. You can list this in your evidence log in Part 10.2.

Background information

The WCPG provides funding to prepare a UK Forestry Standard-compliant Woodland Creation Design Plan. Landowners, land managers and public bodies can apply to the FC

to support the planning of woodland creation. The grant has two stages. Stage 1 funds landowners to undertake a desk-based checklist. Stage 2 of the grant funds a woodland creation design plan – this, when completed and approved, is the part which you can use to support your EIA application. WCPG therefore provides funding for much of the information required by a **subsequent** EIA 'stage 1' application.

You may invalidate your current or future WCPG application if you apply for a 'stage 1' EIA before you have completed stage 2 of the WCPG.

For more information, visit the [Woodland Creation Planning Grants page](#).

6.2 Please provide an overview of your afforestation proposal.

Give your answers to the nearest tenth of a hectare. You can use the [Forestry Commission's Map Browser](#) to measure the area of your proposal.

Please provide the area of trees you intend to plant, and the area of open space in your proposal. Please also split this into the respective areas of conifer and broadleaf.

Use the [Forestry Commission's Map Browser](#) layers to measure how much of your proposal sits on:

- Low risk land (see the information in Part 4.1 of this guidance)
- Sensitive areas (listed in Part 4 of this form)
- Neither

You will be asked about adjacent projects in Part 7, so do not include adjacent projects here.

6.3 Please list the tree species mix that you intend to plant for each compartment in your proposal.

If this application is accompanied by an approved Stage 2 Woodland Creation Planning Grant (WCPG) plan then you do not need to complete this section. Please reference the page and section where this information sits in your Stage 2 plan and attach the plan to this application.

If you don't have a Stage 2 WCPG plan, please fill in the table on the form showing your proposed tree species mix and its distribution, including stocking density, calculated at the number of trees per hectare. The FC will consider the proportion of non-native

species, like eucalyptus and paulownia, in your proposal, as well as other species choice when considering the suitability of your proposal.

If your proposal is over 10 ha, use [Forest Research's Ecological Site Classification \(ESC\) online tool](#) to help you choose tree species that are appropriate for your site and resilient to long term climate change.

You should list tree species that account for more than 20% of the planting. The table on the form shows an example where oak and ash each account for more than 20% of the planting.

The tree species you list can be expressed by name (e.g. Sitka spruce) or by standard abbreviation (e.g. SS). If due to nursery availability or other factors, you do not yet know what species mix you will be planting you can mark these as 'undecided' and add information on your intended species mix e.g. 'conifer', 'broadleaf', 'native' or 'non-native'.

6.4 Please outline the aims and objectives of your afforestation proposal.

If this application is accompanied by an approved Stage 2 WCPG plan then you do not need to complete this section. Instead, please reference the page and section of your plan where this information sits.

If you are not including a Stage 2 WCPG plan, then you must provide a brief but detailed overview of your afforestation proposal, **proportionate to the scale of your proposal**.

Your aims and objectives are: the purpose of your forestry proposal, and measurable outcomes you want the completed project to deliver, e.g. in terms of a volume of timber production, volume of carbon sequestration, improved water quality, flood management or bio-diversity, or recreation and leisure.

Comment on the design of your proposal: your proposed species, plans for any open ground and site access, and explain how this will help deliver your aims and objectives.

You should also show this in your site maps and plans (see Part 10).

More information

You could refer to the [UK Forestry Standard](#) to help plan your woodland. For larger proposals, the Forestry Commission practice guide, [Design techniques for forest](#)

management planning, can give you further help on designing your new woodland. To show how your project will mitigate for deer impact, refer to the GOV.UK guidance Woodland Creation and mitigating the impacts of deer.

6.5 How do you intend to prepare and maintain the site for your proposal?

You can either:

- attach an operational plan for carrying out the work

Or

- give details on the form (or in an attached map).

More information about operational plans can be found in the UK Forestry Standard (UKFS). The UK Forestry Standard states that every project should include an operational plan to show how you intend to carry out the work. The FC can approve the EIA without an operational plan, but one must be produced in order for your approved project to be UKFS-compliant.

You should provide full details of your plans to prepare the ground including:

- planned drainage
- cultivation techniques
- fencing, including deer fencing
- initial herbicide spraying
- fertilizer application.

You should provide details of how you intend to ensure the trees will establish and survive including:

- your plans to protect the trees from browsing mammals
- your plans for deer management
- protection from weeds
- any aftercare.

This may best be portrayed on a map or plan of your site.

More information

For larger proposals, the Forestry Commission practice guide Design techniques for forest management planning can give you further help on designing your new woodland.

For more information on approved cultivation techniques for different soil types, please refer to [Operations Note 53 'Guidance on cultivation and UKFS compliance for application in England'](#).

[Managing forest operations to protect the water environment](#) sets out good operational practice for cultivation.

For showing how your project will mitigate for deer impact, refer to the GOV.UK guidance [Woodland Creation and mitigating the impacts of deer](#). or contact one of the FC's regional deer officers.

Part 7 – Adjacent projects

Any EIA afforestation projects completed (i.e. fully planted, but not necessarily established) within the last five years, adjacent to your proposal must be considered as part of your proposal. This may change your proposal area and therefore how the FC processes your application.

Adjacency is relevant to establishing the land sensitivity and threshold of your proposal. **You do not need to seek engagement with stakeholders in relation to adjacent projects.**

You should consider projects to be 'adjacent' if they are (in part or in whole) within 500m of the boundary of your proposal.

Afforestation projects that rely upon natural regeneration will be deemed to be complete when associated works (such as the erection of a deer fence) are complete. Completion of an afforestation project is not dependant upon trees establishing or growing to maturity.

7.1 Is there an afforestation project adjacent to your proposed project that has been completed within the last five years?

An adjacent project may be on your land, or it may be on a neighbouring property.

A site survey should identify nearby afforested sites. Desk based checks are also possible. Some projects that have come to the FC for grant funding can be found on online using the [Forestry Commission's Land Information Search](#). Historical aerial photography, widely available online, can also be of use.

Please indicate 'Y' for Yes or 'N' for No.

7.2 How many hectares of afforestation have been completed (i.e. planted, but not necessarily established) on adjacent sites within the past five years?

Please give the area of recent completed projects. If there are none, please put '0' hectares here.

7.3 Adding adjacent projects to your current afforestation proposal (as listed in 6B), what is the combined total area of your proposal and adjacent projects?

If 0 ha are being added (from adjacent projects), please just re-supply your original proposal area here.

7.4 Do adjacent projects sit within or affect additional sensitive areas (as defined in Part 4) not also covered by your proposal?

Adjacent projects could be on or affecting sensitive areas that your existing proposal did not affect. You, and the FC, will need to take these into account when considering your proposal threshold. As in Part 4, Question 4.2, you should use the [Forestry Commission's Land Information Search](#) and [DEFRA'S MAGIC Map](#) to identify sensitive areas, and if there are any, give details of whether they are just a National Park or Area of Outstanding Natural Beauty, or another sensitive area. Detail how they are affected by adjacent projects. If not, mark 'No'.

Part 8 – Environment checks A – Land use

A.i How is the current land use of your proposal area best described? Identify the proportion of current land use to the nearest 10%

Provide the percentage splits that best apply to your land's current use, e.g. 50% scrub, 50% arable.

Make sure you show these land use types on your plan, indicating recent land use change (from within the last three years) and the land use on adjacent land. You could use your Rural Payments Agency land code annual returns (if you have one) to see any differences in land use in the past years.

Part 8 – Environment checks B – Biodiversity

B.i. Have any priority habitats (under section 41 of the Natural Environment and Rural Communities Act 2006) or habitat features been identified within, or which may be affected by, the proposal area?

As for B.ii. below.

B.ii. Have any protected species or species of principal importance, or other species important to the area, been identified within or which may be affected by the proposal area? How to answer B.i and B.ii

How to find out if your answer is 'yes' or 'no' for B.i. and B.ii

Habitat checks

- [DEFRA's MAGIC map](#) will show whether your site has been mapped as a priority habitat. Go to Habitats and Species < Various Priority Habitat Inventory layers to check.
- You should check for habitats and habitat features by conducting a walkover survey.

Species and habitat checks

- **For every proposal**, you must show you have been in touch with your [Local Environment Records Centre \(LERC\)](#). This centre can provide information they hold on habitats and species that have been recorded on your land. They should be the first place you contact. There may be a charge for the information they hold, but it could potentially avoid the need to undertake a site survey.
- Use [DEFRA's MAGIC map](#) and the [Forestry Commission Map Browser](#) to check for nearby RSPB reserves and RSPB important bird areas, and priority creation areas for red squirrels. The latter are mostly found in the north of England. Contact the [Biological Records Centre](#). This national centre has vast datasets on species from the volunteer recording community.
- Use the [National Biodiversity Network's \(NBN\) Atlas](#) to look for recorded priority habitats, important and recorded species, and other mapped environment features. Note: NBN Atlas have controls on how the information they publish can be used. Read the terms and conditions for the use of published data and credit any data providers in any reports or plans you produce.
- Your [local wildlife trust](#) can provide advice based on any records they hold.
- The [Woodland Wildlife Toolkit](#) can help inform the planning of new woodland. It is not designed to identify species that are present on any site, but gives practical guidance on how to plan forestry operations in a way that is sympathetic to the needs of identified species.

Species and habitats surveys

- If initial investigations have identified priority habitats or species, you may need to undertake further surveys, such as a Phase 1 or Phase 2 Habitat Survey, or a species survey.
- Trained ecologists who can undertake survey work can be found using the directory provided by the [Chartered Institute of Ecology and Environmental Management \(CIEEM\)](#). Alternatively, a forestry agent will likely be able to organise these surveys on your behalf.
- If it is likely you will need a species survey, seek advice from the Forestry Commission. Some surveys, such as breeding bird surveys (relevant for afforestation projects that may affect open habitat birds), need to take into

account surrounding land up to 1km from your site. Other constraints have smaller buffer zones. Take into account the seasonality of surveys and plan ahead to avoid delaying your project. Existing surveys can be used, but should ideally be from the most recent survey season. Surveys will be subject to verification by the Forestry Commission, which may require further information from you if the information is inadequate.

If your answer to either B.i. or B.ii is 'yes'

- Mark your map/plan with habitat features and priority habitats.
- You should engage with Natural England if you are planning to afforest non-woodland priority habitat (open habitat).
- Explain how your plan will avoid, mitigate or compensate for any effect on these habitats or species. For more information on how to do this, refer to the following:
 - GOV.UK [Manage and protect woodland wildlife](#)
 - [Operations Note 043](#), which clarifies the principles you should adopt when considering afforestation on or near priority habitats
 - The Forestry Commission's field guide to [Priority Open Habitats and Woodland Creation](#)
 - The Forestry Commission and Natural England joint guidance note (PDF): [Guidance for afforestation proposed on or near nationally important upland breeding wader areas](#).
 - The background information set out below.
- Use Part 9 of the form to record what stakeholder engagement, if any, you have undertaken for B.i. and B.ii. Attach any evidence, including copies of data searches and a report from the local environment records centre. You may also have information from other experts.

Background information

Priority habitats are set out under section 41 of the Natural Environment and Rural Communities Act 2006. They are habitats of principal importance for conservation in England. More information, including definitions of these habitats, can be found on the Joint Nature Conservation Committee's [list of UK BAP Priority Habitats](#) which, while now out of date, formed the basis for the current section 41 list.

You can also find information about non-woodland priority habitats in part 4 of the FC Field Guide: [Priority open habitats and woodland creation](#).

Habitat features are indicators of remnant priority habitat and might include: features such as ponds, ancient hedgerows, wet flushes and spring lines.

Both priority habitats and habitat features have the potential to harbour important species, so it is important to identify them in your proposal area. Your proposal should not result in the loss of an important habitat.

Certain species are protected in England under numerous lists or legislation. Other species are considered at risk, or important.

- European Protected Species, such as dormice, bats and otters, are protected in UK law under The Conservation of Species and Habitats Regulations 2017.
- The schedules of the Wildlife and Countryside Act 1981 protect wild birds, certain animals and certain plants.
- The Red Data Book, maintained by the International Union for the Conservation of Nature (IUCN) maintains an international list, published as the Red Data Book, of species categorised by perceived risk. This includes a Red Data Bird List.
- The UK Red list for birds includes the IUCN red list, as well as an amber list of birds with unfavourable conservation status.
- Other species are identified as species of principal importance for the conservation of biodiversity in England, under section 41 of the Natural Environment and Rural Communities Act 2006.

However, a species of plant or animal does not have to feature on a list to be considered important to a local area.

Your proposal should not result in a loss of biodiversity in its area, and you should undergo the appropriate level of field checks, including surveys where needed, to check your proposal area for protected and important species. This may include looking beyond your proposal area at adjacent and nearby land. For example, afforestation proposals may adversely affect nearby bird areas and reserves.

If you have identified a protected species you may need to commission additional surveys. Most protected species will require a licence in order to disturb them and their habitats. Rules differ for how they are protected. You will be asked to confirm you understand your particular obligations towards European Protected Species, wild birds, and badgers in Parts B.iii. – v., below.

B.iii. Have you considered the effect your proposal will have on wild birds in the area and diversity of habitat(s) for wild birds?

As for B.v. below.

B.iv. Are you aware of the Good Practice guidance to safeguard European Protected Species when undertaking forestry operations and the need to obtain a licence if you cannot comply with the Good Practice?

As for B.v. below.

B.v. Are you aware of the Good Practice guidance to safeguard badgers when undertaking forestry operations and the need to obtain a licence if you cannot comply with the Good Practice?

How to find out if your answer is 'yes' or 'no' for B.iii. – B.v

Landowners are legally obliged to take account of protected species. Please indicate 'yes' to parts B.iii. – B.v. to show that you are familiar with your obligations with regard to wild birds, European Protected Species, and badgers. By indicating 'yes' the Forestry Commission will take you at your word that you are familiar with these obligations.

More information on managing and protecting woodland wildlife, a checklist for protecting European Protected Species during woodland operations, and information on wildlife licences can be found on [GOV.UK's 'manage and protect woodland wildlife' page](#).

B.vi. Have any Local Sites been identified that may be affected by your proposal?

How to find out if your answer is 'yes' or 'no' for B.vi.

Check for Local Sites:

- Check local authority information online or contact the [Local Environment Records Centre \(LERC\)](#).
- If your local authority has a Local Nature Recovery Strategy they may have already prepared a map of Local Sites.

- For geological sites, The [Geology Trusts](#) can provide local records and maps.
- For geological sites, you can find county-based geo-conservation volunteer groups in England using [GeoConservationUK](#). They will keep a record of geological sites that are important to the region.

If your answer to B.vi. is 'yes'

- Describe the features identified on the form.
- Provide a map from the Local Environment Records Centre, your local authority, GeoConservationUK or the Geology Trusts.
- Engage with the authority who manage the site – often the local authority in partnership with other organisations – to find out how you can mitigate any impact from your proposal.
- Use Part 9 of the form to record what stakeholder engagement you have undertaken for B.vi. attach any evidence, and log your proposed mitigation.

Background information

Local Sites are non-statutorily protected sites, designated locally for their substantive nature conservation importance, either for wildlife or geology. They are designated by locally developed criteria and are generally mapped at a county level.

Their names may vary across the country (e.g. Local Wildlife Site, Site of Nature Conservation Importance (SNCI), etc.), but they can all be referred to as Local Sites. There are over 40,000 such sites in England, some with as high quality biodiversity as Sites of Special Scientific Interest.

Local Sites are designated, monitored and protected by Local Sites Partnerships, usually involving a combination of the local authorities, The Wildlife Trust, and local records centres.

Part 8 – Environment checks C – Water and soils

The FC produces [FC Practice Guidance: Managing Forestry Operations to Protect the Water Environment](#). This sets out how to design an afforestation project in a way that minimises its impact on water and soils. The FC will take these design principles into account when screening your proposal.

C.i. Have any public or private drinking water supplies been identified within or which may be affected by your proposal?

How to find out if your answer is 'yes' or 'no' for C.i.

You can identify drinking water supplies using the following:

- Conduct a walkover survey to look for obvious drinking water sources and supply infrastructure.
- Check with relevant neighbours and landowners. Ask whether they have records or evidence of existing licence agreements, access routes or buried pipes.
- Check with the Environment Agency, local water company and local authority for drinking water supplies and associated infrastructure. The local authority or local water company may also have records of drinking water quality testing.

If your answer to C.i. is 'yes'

Provide further information on the form:

- Mark drinking water-related features on your project map.
- You will need to incorporate appropriate buffer zones around certain water-related features. The [UK Forestry Standard](#) lists buffers in its Guidelines on Forests and Water. Make sure these buffers are visible on your maps.
- For larger afforestation schemes, it is good practice to engage with the Environment Agency, local water company or local authority when your afforestation proposal is likely to impact on the yield of drinking water abstraction locations (where water is taken out of the ground). Use their advice to address your proposal's potential impact on drinking water supplies. Refer to their advice in your application.
- Use Part 9 of the form to record what, if any, stakeholder engagement you have undertaken for C.i, attach any evidence, and log your proposed mitigation.

Background information

Your new trees' roots and foliage can affect nearby drinking water.

Your afforestation proposal may affect drinking water supplies outside of the proposal area – for example, by providing shade in the future, or, particularly in the case of conifer species, acidifying surface water.

Public and private drinking water supplies include water bodies that provide drinking water, and water supply infrastructure, such as abstraction points (where water is taken out of the ground), wells and boreholes, pumps, and open / covered reservoirs.

C.ii Is your proposal in an area identified by the Environment Agency as a Nitrate Vulnerable Zone or a Drinking Water Safeguard Zone?

How to find out if your answer is 'yes' or 'no' for C.ii.

Find Nitrate Vulnerable Zones and Drinking Water Safeguard Zones. Find out whether your proposal sits in these zones by using the [Environment Agency's map of environment data for farmers and landowners](#).

Nitrate Vulnerable Zones are also found as a layer on Defra's MAGIC map:

Designations < Non-statutory < Drinking Water Safeguard Zones (Surface water) (England)

and

Designations < Non-statutory Drinking Water Safeguard Zones (Groundwater) (England)

If your answer to C.ii. is 'yes'

- If your proposal is in a Nitrate Vulnerable Zone you must follow the [legal requirements outlined on GOV.UK](#) on the use of nitrogen fertiliser and storing of organic manure used in your afforestation proposal. Make sure that your proposal outline ([Part 6](#)) includes these details.
- If your proposal is in a Drinking Water Safeguard Zone (SgZ) you must take care when using any 'at risk' substances listed on the [Environment Agency map](#), as these could cause pollution of water. There is also [water protection advice available on the Voluntary Initiative website](#).
- You may wish to engage with the Environment Agency.
- Use Part 9 of the form to record what stakeholder engagement, if any, you have undertaken for C.ii, attach any evidence, and log your proposed mitigation.

Background information

Nitrate Vulnerable Zones (NVZs) are areas designated as being at risk from agricultural nitrate pollution. Afforestation in the form of shelterbelts or buffer strips between

agricultural land and watercourses can be beneficial in NVZs as it can reduce the risk of nitrate pollution from fields into watercourses.

Drinking water safeguard zones (SgZs) are designated areas in which the use of certain substances must be carefully managed to prevent the pollution of drinking water.

C.iii. Is your proposal in an area identified by the Environment Agency where groundwaters are at poor quantitative status?

How to find out if your answer is 'yes' or 'no' for C.iii.

You can identify poor quantitative status by using the [Forestry Commission Browser](#) layer: Data < Targeting and scoring < W4W Less-than-good Quantitative Status

If your answer to C.iii. is 'yes'

- Afforestation must not cause further deterioration to groundwater quantities. You can find out more about groundwater protection in the [UK Forestry Standard](#).
- Check that your afforestation proposal is suitable to the area by reviewing the area's River Basin Management Plan, if there is one available for your area.
- Contact the Environment Agency for further advice. It will be useful to provide them with soil information when you do so, possibly from a site-based soil survey.
- If your afforestation proposal is over 50ha you should seek the advice of the Environment Agency on the potential effects of woodland creation on water resources, especially for proposals involving conifer and short rotation forestry crops, which have higher water use.
- Use Part 9 of the form to record what stakeholder engagement, if any, you have undertaken for C.iii., attach any evidence, and log your proposed mitigation.

Background information

"Groundwater" refers to all water beneath the surface of the ground. "Poor quantitative status" means that there could be limited groundwater availability.

Afforestation may affect how much water is available in the area, depending on the tree species you plant, and the soil type.

Your project may affect how water drains from the site, and go on to affect the water quantity of statutorily protected river systems, such as SACs and SSSIs.

C.iv. Is your proposal in an area identified by the Environment Agency where acidification of surface water is an issue?

How to find out if your answer is 'yes' or 'no' for C.iv.

Identify areas where acidification is an issue:

- Use the Forestry Commission Browser layer: Data < Targeting and scoring < CS Water – Water Quality – Acidification
- You should look for areas that are 'failing to meet good status' and at 'risk of failure'.
- Check [Forest Research's Acid Vulnerable Catchments \(AVC\) mapping](#), which marks areas that are 'at risk' or marked as 'fail'.

If your answer to C.iv. is 'yes'

- Afforestation must not cause any further deterioration to surface water. You should engage with the Environment Agency or local water authority. For more information on recommended actions, look at the section on Acid Vulnerable Catchments in Forestry project checks: Constraints.
- Refer to [Forest Research Practice Guide 'Managing forests in acid sensitive water catchments'](#) on the process for assessing whether planting can go ahead.
- You may have to carry out a Critical Load Assessment. This assessment confirms how much pollutant deposition the environment can tolerate. It is most likely to be needed if the catchment area is over 100ha, and the total proposed and existing woodland cover exceeds 30% of this, but the Forestry Commission will confirm whether it's required.
 - If the assessment is that afforestation is still appropriate, show how your proposal's design in Part 6 meets assessment's recommendations.
- Use Part 9 of the form to record what stakeholder engagement, if any, you have undertaken for C.iv., attach any evidence, and log your proposed mitigation.

Background information

Forestry is known to affect water acidification. Increasing acidification can damage fisheries and cause adverse ecological changes to freshwaters. This is typically more of an issue for conifer species.

C.v. Is your proposal adjacent to a watercourse and/or does it affect flood defence structures or facilities?

How to find out if your answer is 'yes' or 'no' for C.v.

Check for watercourses, flood facilities and flood risk. Conduct a walkover survey and locate and mark the following:

- flowing water bodies
- flood plain boundaries
- flood defences*
- other flood and river control infrastructure

*Flood defences include any bank, wall, embankment, barrier, whether natural or artificial, against the inundation. This can include natural or artificial high ground and river control structures include measuring devices, sluices, weirs, pumps and pipes.

- In addition to a walkover survey, check maps for any watercourses. Watercourses include all rivers, streams, ditches, drains, canals, cuts, culverts, dykes, sluices, sewers and passages through which water flows, except a public sewer or drain.
- You can [check long term local flood risk in your proposal area on GOV.UK](#). You can also find [background on flood risk management on GOV.UK](#).
- Identify the flood plain using the [flood map on GOV.UK](#) and see if your proposal lies within it.
- Some flood risk areas have been identified as a priority for woodland creation because they will alleviate flood risk. You can find these on the following [Forestry Commission's Map Browser](#) layers:

CS Cross-cutting < Project Areas < Woodland for Water Priority Catchments
and

CS Cross-cutting < Project Areas < Woodland for Water Project Areas

- Look at the Natural Flood Management mapping [tool](#) (you will need to use Internet Explorer as your browser). The suite of PDF maps on this tool will signpost you towards potential areas for woodland planting.

If your answer to C.v. is 'yes'

- Record all features on your proposal's plan/map.
- Read about [environmental permits for flood risk activities on GOV.UK](#).
- If your afforestation proposal is close to flood defence structures or watercourses, you will need to contact the relevant authority, according to the buffers below:
 - Consult the Environment Agency if trees are to be planted within 8m of a main river, main river culvert or flood defence. A [permit](#) may be required. [View a map of England's main rivers](#).
 - Consult the Environment Agency if trees are to be planted within 16m of a tidal main river, tidal main river culvert or flood defence. A [permit](#) may be required.
 - Consult the Internal Drainage Board in areas covered by the Internal Drainage District if trees are to be planted within 8m of a watercourse. You can find these districts on the Association of Drainage Authorities [interactive map](#).
 - Consult the local authority for any planned structures in Ordinary watercourses. However, there are no restrictions for planting trees within the riparian area.
- You may also need to engage with any relevant neighbours to find out whether existing flood structures will be adversely affected, or byelaws breached by, your proposal.
- Use Part 9 of the form to record what, if any, stakeholder engagement you have undertaken for C.iv. attach any evidence and log your proposed mitigation.

If your answer to C.v. is 'yes', and your proposal is over 50ha and within a floodplain

- Contact the Environment Agency at enquiries@environment-agency.gov.uk and/or the Lead Local Flood Authority.
- The Environment Agency and/or Local Flood Authority may carry out a Flood Risk Assessment and may seek further information on your proposal in order to do so.
- Flood Risk Assessment may also be required for woodland creation less than 50ha within a floodplain, depending on planting density and positioning in the floodplain. Information required could include modelling to demonstrate:
 - a reduction in flood risk as part of a Natural Flood Management project
 - the planting will not result in an increase in flooding to third parties.
- Seek the advice of the relevant water company, local authority and any relevant neighbours who may also have views on the appropriateness of your afforestation proposal. They may have important input on emergency planning for flooding incidents.

Background information

In some locations, afforestation can make flood risk worse by causing potential blockages, (where water “backs up” upstream to flood property or infrastructure). They can also synchronise flood flows (slowing the time of arrival of a flood peak in one tributary, so that it interferes with another). Flood risk should be considered especially when trees are planted on the flood plain, or within eight metres of a water course.

If your proposal is outside of recommended planting areas, and over 10ha, then you are more likely to need to consider the impact of flood risk.

C.vi. Have any other water features been identified within, or which may be affected by your proposal?

How to find out if your answer is ‘yes’ or ‘no’ for C.vi.

Find water features:

- Conduct a walkover survey to look for water features other than drinking water supplies and watercourses. This may include adits (mine entrances used for drainage), springs, seepage and wetland areas, ponds and lakes.
- If you have already identified watercourses and drinking water supplies in C.i. and C.v. you do not need to include these again here.

If your answer to C.vi. is ‘yes’

Provide further information on the form:

- Mark water-related features on your project map.
- Seek Environment Agency guidance, or, if necessary contact the Environment Agency for advice if your proposal is likely to have a significant effect on a water feature.
- Use Part 9 of the form to record what stakeholder engagement, if any, you have undertaken for C.vi, attach any evidence, and log your proposed mitigation.

Background information

Water features are any bodies of water on your land, including boreholes, wells, adits, springs, seepage and wetland areas, ponds, lakes and watercourses. You should identify drinking water supplies and watercourses in parts C.i. and C.v. as proposals affecting these require engagement with multiple statutory bodies. Other water features are less likely to require engagement, but you should seek advice from the Environment Agency if you are concerned about your project’s likely effect.

C.vii. Is your proposal on or near an area of peaty soil?

How to find out if your answer is 'yes' or 'no' for C.vii.

Find peaty soils:

- Use the [Forestry Commission Map Browser](#) to identify peaty soils (in the layer Targeting and scoring < Natural England Peat Map). These are labelled as deep peaty soils, shallow peaty soils and soils with peaty pockets.
- The peat map does not cover all peaty areas, so you should also conduct a thorough walkover of your site, or a soil survey, particularly where peaty soils are known to be nearby.
- Make sure you also consider your proposal's impact on any bog or wetland habitat adjacent to your proposal.

If your answer to C.vii. is 'yes'

- The land will require a **peat survey** and potentially a vegetation and organo-mineral soil survey.
- Contact Natural England for advice on what type of woodland, if any, might be appropriate on your site.
- Read [The decision support framework for peatland protection and the establishment of new woodland \(Interim\)](#) which provides a decision framework for landowners considering planting trees that may affect peaty soils.
- Detail how your project plan and operational plan are designed to avoid, mitigate and compensate for any effect on peaty soil.
- If there are peaty soils show where those lie on your map or plan and explain how your proposal accounts for them.
- Use Part 9 of the form to record what stakeholder engagement, if any, you have undertaken for C.vi. attach any evidence, and log your proposed mitigation.
- The soil type you identify in your soil-based site survey should determine the cultivation technique you adopt in your operational plan (see Part 6). [Refer to Operations Note 53](#) for more information.

Background information

Peaty soils and organo-mineral soils (also known as shallow peat) have delicate hydrological systems that can be affected by nearby afforestation. Peaty soils are particularly good at absorbing carbon over time. Disturbing existing peat to plant woodland can release more carbon than can be absorbed by the trees over their lifetime.

New planting on peat that is over 30cm deep, on sites targeted in a Local Nature Recovery Strategy for peatland restoration, and on sites that would compromise the hydrology of adjacent bog or wetland habitats is unlikely to be approved unless the woodland will be very low density.

Part 8 – Environment checks D – Landscape character

D.i. What is the national landscape character area?

How to identify national landscape character

- Identify the national character area (NCA) on [MAGIC](#), using the layer Landscape < Landscape Classifications < National Character Areas (England)
- Write it on your form as it is written on MAGIC e.g. 'Severn and Avon Vales'.

Background information

England is divided – by natural lines in the landscape, rather than by administrative boundaries – into 159 distinct National Character Areas (NCAs).

[Natural England's online list of all NCA profiles](#) provides data, landscape descriptions and statements of environmental opportunity which should inform the design of your afforestation proposal.

D.ii. What is the local landscape character type?

How to identify local landscape character

- Contact the local authority to find out whether there is a character statement for the area. They may have carried out a landscape character assessment ([LCA](#)) and be able to provide you with a map.
- Describe the local landscape in a few words, for example 'wooded estate downland'.
- Only very large proposals are likely to span more than one character area.

Background information

Local landscape character statements are usually produced by the local authorities and are used to identify and describe variation in the character of the landscape. These authorities also have the power to designate local landscapes of importance (local landscape designations, or LLD) in order to protect them from man-made interventions.

D.iii. Does the local / national landscape character support afforestation in this location?

If you are minded to mark 'yes', first make sure you:

- Conduct a walkover survey of your site, taking plenty of photographs.
- Use the [UK Forestry Standard's](#) guidelines on landscape (UKFS – Landscape, section 6.4) to make sure your proposal design accounts for local landscape characteristics.
- Refer to any landscape character assessments and the National Character Area for your proposal location.
- Evidence stakeholder engagement, particularly with neighbours, on impacts such as loss or view or light or obstruction of access.
- When your proposal is in a protected landscape (e.g. a National Park), consult with the relevant authority (e.g. the National Parks Authority) on your proposal's potential to integrate into the landscape. The GOV.UK page [Forestry project checks](#): Constraints lists possible protected landscape types.
- Use Part 9 of the form to record what stakeholder engagement, if any, you have undertaken for D.iii. attach any evidence, such as details from the character assessment, and log your proposed mitigation.

For larger proposals:

- For proposals greater than 10ha, you should engage with your local planning authority to check that your proposal is suitable for the landscape character. You can mark this in Part 9 –Stakeholder engagement.

- For larger proposals, the FC recommends using a qualified specialist to undertake Landscape Visual Impact Assessment (LVIA). EIA regulations allow you to use existing surveys and reports, providing they are up to date. Information about LVIAs can be found on the [Landscape Institute's technical resources page](#).

Part 8 – Environment checks E – Historic environment

E.i. Have any local historic environment records identified features which may be affected by your proposal?

How to find out if your answer is 'yes' or 'no' for E.i.

Find historic features:

- **For every proposal**, you must provide your correspondence with the [local authority historic environment/archaeology service](#) and obtain Historic Environment Record (HER) and Historic Landscape Characterisation (HLC) maps. If local HLC data is not available, national HLC available in the 'Landscape' section of [Defra's MAGIC map](#) can be used.
- You may also wish to check (or ask the local authority historic environment service to check) the following sources for historic features:
 - LiDAR data (available from the Environment Agency)
 - Digital aerial photographs (where available online, such as historic imagery on Google Earth)
 - Selected historic mapping where known to exist (this may involve visits by the specialist to selected archives – the local historic environment service will be able to advise, or use online resources such as those provided by the [National Library of Scotland](#) and [old-maps.co.uk](#))
- Conduct a visual inspection yourself of your site to identify potential historic environment features or those identified within the HER, e.g. ridge and furrow or burial mounds. Pay particular attention to uncultivated land, such as heathland or upland moor.
- Where HER data, HLC data and/or visual survey identifies significant evidence, the local historic environment service or Forestry Commission may recommend specialist surveys, which you should be prepared to commission. These could include:

- Analytical archaeological survey (level 1 walkover)
- Geophysical survey
- Drone survey
- Aerial investigation and mapping
- Metal detecting

If your answer to E.i is 'yes'

- Show historic environment features on the project plan/maps.
- Detail how your project plan and operational plan are designed to avoid, mitigate or compensate for any effect on the historic environment. Historic assets can be adversely affected by ground preparation and infrastructure associated with your afforestation proposal, and by root growth. A historic feature's setting can be an intrinsic part of its value, but this can be fundamentally changed by new trees.
- Leave historic environment assets within open space to help conserve both them, and their vistas and setting; this can also improve the habitat structure of your new woodland.
- Consider how you can complement or enhance the historic environment through woodland creation. New woodland can be designed to reflect the form of the historic landscape. In some cases it can be appropriate to restore woodland cover on sites that were wooded in the recent past or provide public access to and interpretation of heritage features.
- Commission specialist surveys (e.g. archaeological walkover surveys, geophysical surveys or drone surveys) where evidence is significant. Seek advice from local historic environment services and/or the Forestry Commission where appropriate.
- Use Part 9 of the form to record what, if any, stakeholder engagement you have undertaken for E.ii. attach any evidence, and log your proposed mitigation.

Background information

Local historic environment features are important historic sites. They include visible earthworks, buried archaeological remains, ruins and structures. They are not generally mapped at a national level, with scheduled monuments being the notable exception.

Consideration should be given to burial grounds (which are protected by the Burial Acts) and aircraft crash sites (which are protected by the Protection of Military Remains Act 1986).

Part 8 – Environment checks F – Open access land

F.i. Is your proposal in an area of open access land as defined by the Countryside and Rights of Way (CROW) Act 2000?

How to find out if your answer is 'yes' or 'no' for F.i.

Check for open access land. Use [Defra's MAGIC map](#) and [Natural England's open data](#) to identify the type of open access land your project might affect.

You should check for the following types of land:

- Registered Common Land
- Section 15 Land (Mountain, Moor, Heath or Down)
- Section 16 Land (Dedicated Land)

These layers are defined by the CROW Act 2000. If any of these fall in your proposal area, you must answer 'yes' to F.i.

Use [Defra's MAGIC map layers](#):

- Access < Countryside and Rights of Way Act, Section 15 Land (England)
- Access < Countryside and Rights of Way Act 2000 - Access Layer (England)
- Access < Registered Common Land (England)

Using [Natural England Open Data](#), search for 'CRoW Act 2000 - Section 16 Dedicated Land' to see if your proposal affects any dedicated land.

If your answer to F.i. is 'yes'

- Be aware that your afforestation proposal should maintain the existing levels of access to the land – in most cases, this will be the preservation of a path or desire line.
- Conduct a walkover survey to identify paths and desire lines, and places where users congregate.
- Map the location of any routes, points of interest and vistas on your plan.
- Engage with your [Local Access Forum](#) to reach an agreement on your plans to afforest open access land.

- Engage with local stakeholders who have an interest in accessing the land, and use their local knowledge to inform your proposal design (for instance, neighbourhood, rambling or equestrian groups).
- If your afforestation proposal is on Common Land, you may need to seek consent from the Secretary of State before you commence works. See Forestry project checks: Constraints for more information on legal requirements.
- Use Part 9 of the form to record what, if any, stakeholder engagement you have undertaken for F.i. attach any evidence, and log your proposed mitigation.

F.ii. What area (ha) of your proposal is on land subject to CROW Open Access?

Use the MAGIC map or the FC's Map Browser to measure how much of your proposal sits on open access land, looking for the layers listed in F.i. Give this area to the nearest tenth of a hectare.

Background information

The Countryside and Rights of Way Act 2000 (CROW Act) normally gives a public right of access to land mapped as 'open country' (mountain, moor, heath and down) or registered common land. These areas are known as 'open access land'.

Dedicated land is land that has been voluntarily (but permanently) 'dedicated' by the owner. As with open access land, dedicated land is subject to a permanent legal public right of access.

Part 9 – Stakeholders and evidence log

9.1 In the table on the form, record the individuals and organisations who have been contacted regarding your proposal.

If this application is accompanied by an approved Stage 2 Woodland Creation Planning Grant then you do not repeat any consultations that you undertook as part of that process. Please reference the page and section where this information sits in your Stage 2 plan and attach the plan to this application.

The FC will not undertake stakeholder engagement on your behalf. You must undertake your stakeholder engagement prior to submitting your application. Feedback from

stakeholder engagement is necessary to finalise your proposal. However the FC may consult with other bodies to validate the information, and interpretation of that information, that you provide in your completed application.

Alongside the stakeholders recommended in Part 8 – Environment Checks, you can find a list of potential stakeholders Forestry project checks: All projects. This list is not exhaustive.

Please indicate whether a copy of correspondence with the stakeholder has been submitted with your application. It is always good practice to submit a copy of the actual correspondence had with stakeholders so that the FC can assess this first hand.

Please summarise what actions you took based on recommendations by stakeholders, to avoid or mitigate for any adverse affect on your proposal area. This should be reflected in the final design of your proposal, shown in your proposal overview in [Part 6](#).

9.2 Use the evidence log on the form to list supporting information which you are including in your application.

To help the FC process your application without having to request more information, please list any attachments / printed material you are sending in support of your application and, if possible, which question on the application form they support.

This should include:

- Relevant correspondence from the stakeholders listed in 9.1
- Any extra maps, plans, records checks, surveys and information to support Part 8 – Environment Checks
- Your FC-approved Stage 2 Woodland Creation Planning Grant, if you have one.
- You **must** include a map from the local authority historic environment/archaeology service.

Part 10 – Project maps

10.1 Please indicate that your map(s) fulfils FC requirements by confirming the statements on your form.

To design a UKFS-compliant afforestation proposal you should prepare a number of maps. You may be supplying the following maps as part of your project design:

- Landscape Context Plan
- Site Context Map
- Design Concept Plan
- Site Appraisal Plan
- Operational Plan
- Local Historic Environment map

More information about suitable project maps is found at the top of the application form.

The FC expect you to be able to mark 'yes' for every statement in 10.1.

If you have an approved Stage 2 Woodland Creation Planning Grant you can use your existing project plan.

For more information on including a map of local historic environment features, refer to Part 8 E – Environment Checks

10.2 Please mark 'Yes' or 'No' to the statements on the form to show whether or not they apply to your project map(s).

For more information on adjacent land refer to Part 7 – Adjacent Projects.

For more information on habitats and species, water-related features, local historic environment, local geological features, and open access land refer to Part 8 - Environment Checks

Part 11 – Declarations

You (the applicant or agent) should tick all parts of this declaration, and sign on the line.

To insert a digital signature, you should open the form in Adobe Reader.

Your application will not be accepted if this information is not provided or is not complete.

Please email or post completed applications to your local FC admin hub.

Part 12 – Applying for EIA Consent (Optional)

You do not need to fill in this part of the form unless you want the FC to immediately consider your application as a 'stage 2' EIA Application for Consent.

You can ask the FC to immediately consider your application as a 'stage 2' EIA Application for Consent under the regulations, rather than wait for a 'stage 1' EIA decision on whether the proposal is likely to have a significant effect on the environment and, therefore, whether an EIA stage 2 Application for Consent is in fact required. Proceeding immediately to stage 2 is only likely to be beneficial to you if you are confident that your proposal is highly likely to have a significant effect on the environment, because of its location within a designated or sensitive area, its scale, or for some other reason.

If you are planning to proceed immediately to 'stage 2', speak to the FC first, by contacting your local woodland officer.

The FC strongly recommends that you apply for a 'stage 1' EIA Opinion or Assessment of your proposal first, (by completing and submitting this form) and allow the FC to evaluate if EIA 'stage 2' Consent would be required.

For more information on applying for EIA Consent, including the drafting of an Environmental Statement, refer to the scoping guidance: [Undertaking an Environmental Impact Assessment in Forestry \(Scoping\) and Preparing an Environmental Statement](#) (PDF, 652KB, 31 pages).

