



Cranborne Chase Area of Outstanding Natural Beauty



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Dear Zac

EIA-2020-0418 Forestry Planting Proposal at Bonham Farm

Thank you for sending through the second version of this planting proposal. The project area is 88.1 hectares, with some 80% conifers. Clearly a scheme of that dimension needs to be carefully assessed in relation to the impacts on the environment, particularly when the site is within one of the nation's finest designated landscapes, the Cranborne Chase Area of Outstanding Natural Beauty.

Whilst I see that considerable emphasis is given to the comments made by Simon Bonvoisin, following his brief walk over survey, in relation to the Registered Historic Park and Garden to the north and the Listed Buildings, it is noticeable that in this sensitive landscape there has not been a professional study by an appropriately qualified chartered landscape architect of the landscape and visual impacts of the proposal. I also sense from the documentation that the authors have been giving undue weight to vegetation cover, and moving the boundaries of that vegetation cover, when considering landscape character. Furthermore, the documentation does not refer to the AONB Management Plan and, of course, the aims, objectives and policies contained therein are those of the Local Authorities for the management of this nationally important area. It is also noticeable that there is no reference to the AONB's integrated landscape character assessment.

I suspect it would be helpful to both you and the authors of the proposal to set out some information about this Area of Outstanding Natural Beauty.

1. The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles two County, two county scale Unitary, and three District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and

Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage.

2. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage assets and environmental capital.
3. This [AONB's Management Plan](#) is a statutory document that is approved by the Secretary of State and is adopted by the constituent councils. It sets out the Local Authorities' policies for the management of this nationally important area and the carrying out of their functions in relation to it, as required by section 89 (2) of the CRoW Act. The national Planning Practice Guidance [Natural Environment paragraph 040, (21.07.2019)] confirms that the AONB and its Management Plan are material considerations in planning.
4. An Area of Outstanding Natural Beauty is a landscape designation where the purposes are to conserve and enhance the outstanding natural beauty of the area. No AONB is the same and the relevant AONB Management Plan identifies that AONB's special qualities. For the Cranborne Chase AONB these are set out in Chapter 2, page 8 of the Management Plan.
5. Landscape character and qualities are special to each AONB and in chapter 7, page 28, the landscape character, qualities, and issues are set out. The outlines of landscape character types are summarised on pages 30 to 37. Understanding landscape character and landscape character assessment is a key aspect of Chapter 8, page 41 and policy LAN 4 is particularly relevant.

LAN 4 *Ensure the conservation and enhancement of the landscape character, tranquillity and special qualities of the AONB and its setting, particularly those qualities that are sensitive to change.*

6. The natural environment is clearly a significant attribute of semi-natural landscapes of this AONB and the special aspects are set out in Chapter 9, Natural Environment, page 49. Policy NE 3 is particularly relevant as also are policies NE 7 and NE 8.

NE 3 *Work with landowners, farmers, woodland managers and appropriate partners, to establish and enhance coherent and effective ecological networks at a landscape-scale through the development of further farm / woodland clusters or through new environmental land management scheme opportunities.*

NE 7 *Work with relevant organisations, such as Councils and the NFU, on climate change adaptation/mitigation measures and promote good practice examples that are appropriate for the AONB landscape and communities.*

NE 8 *Support partners and landowners to manage existing pests and pathogens, and increase understanding of the dangers from non-native species, pests and pathogens.*

7. The vast majority of Cranborne Chase AONB is farmland or woodland and so the Rural Land Management, Chapter 12, page 79, steers the AONB Partnership's approach. Policy RLM 4 is particularly relevant to woodlands and forestry.

RLM 4 Support and encourage appropriate woodland management, encouraging skills training, reconnecting supply chains and increasing biodiversity, including PAWS restoration.

This AONB is especially concerned to sustain living landscapes and Chapter 14, Sustaining Rural Communities, page 105, considers how this can be achieved without prejudicing the conservation and enhancement of natural beauty. Policy SRC 2 is particularly relevant to activities around forestry and woodlands.

SRC 2 Work collaboratively with landowners, farmers and allied businesses to improve the land-based sectors resilience and profitability whilst helping to conserve and enhance the special qualities of the AONB landscape

8. Conserving and enhancing natural beauty links across many interests and so the historic and aesthetic environments are as important as the natural and wildlife ones. The interlinkages between historic and cultural pursuits, food and timber production, and human settlement and movement impact on the landscapes that we know today. Ancient woodlands and veteran trees are examples of the inter-relationships between those factors and the AONB gives considerable weight to sustaining natural habitats and historic features in sustaining our living landscapes.
9. Whilst this AONB acknowledges that woodlands and forests can act as important carbon sinks, habitats, and sources of inspiration and relaxation as well as usable products it also strongly believes in the 'right tree in the right place' approach. Conserving and enhancing the landscape character of the AONB is a key priority and any woodland planning and design should be considered and undertaken within its broader landscape context. To assist with that, this AONB has an overall [landscape character assessment \[2003\]](#) and a more detailed one for the [Cranborne Chase and Chalke Valley areas \[2018\]](#).
10. The site is in the Kilminster Greensand Terrace landscape character area of the Greensand Terrace landscape character type adjacent to the Penselwood – Longleat Hills landscape character area of the Greensand Hills landscape character type, of the AONB's landscape character assessment. Greater details of the landscape, buildings and settlement characteristics can be found in the [Landscape Character Assessment 2003](#). That document should be available in your office, and it can be viewed in full on our website.
11. The Kilminster Greensand Terrace is a generally flat and open landscape, and at this location it has a gentle and consistent slope towards the south east. Topography has a significant contribution to make towards landscape character and it is noticeable that the Penselwood – Longleat Greensand Hills to the west and north west have clearly a much more hilly topography with quite sharply cut valleys. Those hilly slopes and valley sides are less suited to agriculture and have a high proportion of forestry and woodland cover.

The AONB Partnership has the following comments on this application.

12. At a time when the country is facing significant challenges, with appropriate commitments from Government, regarding nature recovery and making effective use of our best agricultural land, the AONB Partnership has a role in striking the landscape balance. Since the first draft of the current planting proposals the Government's emphasis on nature recovery and farmed landscapes teeming with wildlife has increased substantially. The AONBs and National Parks are not only test beds for environmental land management schemes [ELMS] that enhance wildlife but also incorporate the reality of the mantra of 'public money for public goods' that is key to the 25 Year Environment Plan [25YEP] and the transition to a post-Brexit agriculture. In simple terms the focus on wildlife and biodiversity benefits has increased.
13. The woodland immediately adjacent to Bonham is a mix of ancient replanted woodland and ancient and semi-natural woodland – both priority habitats (magic.gov.uk) and a continuation of this would be preferable to predominantly conifer planting; particularly where mixed with shrub species with plenty of rides and glades. Conifers do support some bird species such as goldcrest and firecrest although neither of these are species of conservation concern. Whilst the early stages of coniferous forestry may support populations of deer, coniferous woodlands are remarkably poor in wildlife, even though they may provide nest sites for raptors that forage over a much wider area. Outside of upland areas it is difficult to recommend conifer plantations as wildlife habitat, particularly when trees are closely spaced in even aged stands. The rare tree sparrow nests around the eastern edge of the old airfield, but the proposed tree planting area does not coincide with their breeding area.
14. Having reviewed the application I have to say that I am surprised to see the comment that the authors were informed that neither an LVIA nor an EIA would be required; that seems strange for a proposal of this magnitude in an AONB. An objective and professionally prepared LVIA is particularly relevant where the authors are simply asserting that from their perspective planting a substantial woodland, primarily composed of conifers, would represent a significant improvement in the landscape without appropriate evidence.
15. I note the tendency of the authors to indicate that consultees support the proposals when in fact they are providing a 'no objection' response. Looking at the Objectives set out on Page 3 it is obvious that the scheme meets the 1st objective of increasing the softwood resource on the Estate. The benefit of the 2nd objective, to improve water quality in the Upper Stour headwaters, appears to be relatively small as the grain of the land runs away from the headwaters of the River Stour, and not towards it. The 3rd objective of carbon sequestration is clearly an obvious factor. However, the alternative carbon capture options are not quoted and, as I am sure you will be aware, there are widely held views that agricultural land, and in particular permanent pasture, can be as effective or more so than woodland in sequestering carbon.
16. The 4th objective to integrate the Woodland into the wider landscape, taking account of the impact on the Stourhead Registered Park and Garden, only covers the Stourhead aspect, and that is covered on a fairly brief site walkover. The nature of the landscape character area is such that a substantial woodland would be difficult to integrate into the wider landscape and, indeed, the cursory consideration of landscape matters does not take account of the wider landscape context.

17. The 5th objective to avoid any significant impact on the historic landscape seems to focus on Stourhead and archaeology rather than the historic environment of the site itself and the immediate neighbourhood.
18. Biodiversity is the 6th objective and, as you will have gathered, the AONB Partnership is of the view that a planting scheme of this scale should be much more strongly, and specifically, focused on nature recovery if it is to have any opportunity of counteracting the negative landscape effects.
19. The proposals indicate that some 80% of planting would be coniferous and obviously that is to achieve the objective of increasing the softwood resource on the Estate. In many ways that primary objective has inherent conflicts with landscape, historic environment, and biodiversity objectives.
20. As you know, the Forestry Commission has a duty under Section 85 of the Countryside and Rights of Way Act to actively take into account the impacts of each decision it makes in relation to the land within an AONB on the purposes of AONB designation, namely conserving and enhancing natural beauty. It seems doubtful that the Commission could demonstrate the relevant audit trail advised by DEFRA for a project of the scale of 88 hectares without an LVIA or an EIA.
21. Furthermore, the AONB Partnership's position was made clear in our response to the initial proposal but neither the Forestry Commission nor the authors of the scheme have sought to engage with the AONB Partnership or its professional team. The AONB Partnership does, therefore, **most strongly recommend** that if the Forestry Commission is minded to support new woodland planting on Bonham Farm then the visual and landscape impacts and nature recovery aspects do need to be much more thoroughly, and independently, investigated and incorporated in any proposals.

I hope these comments are helpful to you.

Yours sincerely

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For and on behalf of the Cranborne Chase AONB Partnership Board

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