

South West Area Team

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Mr Richard Burden,
Cranborne Chase AONB Office,
Rushmore Farm,
Tinkley Bottom,
Tollard Royal,
Salisbury,
SP5 5QA

8th July 2021

Re: EIA-2020-0418 Bonham Farm woodland creation proposal

Dear Richard,

Thank you for your letter dated 13th January 2021 outlining the AONB's concerns and recommendations relating to the woodland creation proposal at Bonham Farm near Stourhead. We acknowledge your comments and provide the following in response.

There is a perceived misconception regarding the ecological benefits of conifer woodlands for biodiversity and wildlife habitat. I note that you state closely spaced, even age conifer stands are not beneficial to biodiversity and that a preference would be to utilize mixed native broadleaf species to further extend the existing ancient and semi-natural woodlands adjacent to the proposal area.

It is the age and structural diversity that are the greater predictors of wildlife abundance in a woodland, not the species. A mixed species planting offers a greater range of habitat niches as opposed to a single species plantation which can lack opportunity for biodiversity; in reality, a 'native species monoculture' is worse for wildlife than a well-mixed conifer planting that includes 'exotics'.

Long term management of the woodland will follow the principles of continuous cover forestry. As such, there will be an initial period during establishment where the woodland will be largely uniform in structure; however, this will be developed over time through the various thinning interventions, to create a more diverse and 'natural' structure, encouraging understorey vegetation to establish, thus providing additional

habitat for insects, ground mammals and nesting birds. This is echoed in the comments from Wiltshire Council's Senior Ecologist, Fiona Elphick, where she notes:

"The belt of existing woodland to the west of the site, designated as County Wildlife Site, is Ancient Woodland in parts only with the remainder being native broadleaf woodland with some conifer. The additional planting proposed by this project will increase the function of the site for biodiversity within a short time following planting, by increasing primary connectivity within the local landscape and augmenting the area available to support wildlife species.

I acknowledge that the proposed programme needs to be commercially viable (at least equal to, if not greater than the current arable use of the site) and therefore the planting mix needs to include a percentage of coniferous species as a cash crop. However although the plan proposed includes the bulk of the planted area to be conifer with some broadleaf, moving progressively nearer the periphery a higher percentage of broadleaf is included. In addition, the plan includes some open areas of grassland and of managed native scrub, thus the aim is for a mosaic of habitat, creating as much ecological diversity as possible while still remaining financially viable.

A comprehensive assessment of the site has revealed no specific sensitive ecological receptors that would likely be adversely impacted by the proposal.

I conclude that the programme of planting will be very unlikely to result in negative impacts to protected habitats or species and will certainly increase the function of the site for biodiversity in the longer term."

Whilst suitable species choice must be a consideration when planning a resilient woodland, there is no defined 'acceptable species' within UKFS. As it stands, the proposal meets the requirements of a healthy, resilient woodland under UKFS and we find no reason to amend the species choice or composition further.

With regard to your comments about carbon sequestration; there is no available evidence that agriculture does anything other than emit carbon. If the AONB is aware of any such research to support this view then it would be helpful to have this source provided.

The Department for BEIS identifies that in 2018⁽¹⁾, agriculture produced 45.4 MtCO₂e; whereas, forestry sequestered 12 MtCO₂e. Research has shown that whilst there is minimal difference in the level of carbon sequestered in shallow soils when comparing agricultural land to woodland, there is clear evidence that the rooting structure of trees provide increased carbon transportation and subsequent storage at much deeper depths than arable crops, thereby increasing the total volume of storage and not just the level of saturation in the top soils. Additionally, the carbon sequestered in the shallow soils remains captured as woodland is not subject to annual tilling and cultivation unlike arable land used for cereal crops.

Perhaps the objection to the proposal pivots on the misunderstanding of the role of agriculture in the Climate Emergency. It is widely recognised that agricultural land

must be removed from production if the UK is to meet its carbon targets and that the aligned emphasis is on achieving net zero in order that climate change does not ruin the protected habitats making them unviable.

In response to your concerns regarding the potential impact on the setting of the Grade 2* Listed building, Bonham Manor; after consultation with our Lead Historic Environment Advisor, we agree that the proximity of the planting to the south of the manor is too close and that more open space should have been included in the original design. To ensure there is no direct impact on the property and to minimise any potential loss of light due to overshadowing from the canopy once matured, we have agreed an amendment to the planting design (attached) to incorporate an additional 20-30m buffer of open space between the woodland and the field boundary. This additional buffer will provide some continuity to the immediate setting of the property and will facilitate greater exposure to sunlight.

With regard to the historic element of the landscape; there is no evidence of any historical importance of the open landscape around the manor, except to say the land has been historically managed for agricultural purposes. However, this fact alone is insufficient justification to prevent a change of land use.

Contrary to your comment that "*...a substantial woodland would be difficult to integrate into the wider landscape..*"; the proposed afforestation is not being integrated in to the wider landscape so much as it is extending in to the foreground from the fringes of an existing, densely wooded backdrop, subsequently providing linkages to existing ancient woodland blocks. A visual inspection from high vantage points across the vale (looking east-west) indicates very little visual change to the overall character of the landscape; it simply brings an existing tree line further into the foreground in an unimposing and unintrusive manner.

The Colchester Declaration demonstrated that the AONB family recognised the need for a more wooded landscape across the Protected Areas in order for them to do their part in helping achieve a sustainable environment and that retaining a static landscape was no longer a viable option. All AONB are required to show a 'meaningful response' to Climate Change in their management plans. We note that the current CCWD-AONB management plan predated the Declaration and would not be updated until 2024 when this section could be included. We therefore must make allowance for the commitments of the AONB even though they have not yet been formulated.

It is now clear that demand for UK timber is stronger than ever following departure from the main timber markets within Europe. The UK imports 80% of its timber (compared to only 40% of its food) and prices have risen following the restriction on supply. With the threat of importing pests and diseases which will impact ancient woodland, the UK must consider the timber supply chain.

The duty of the AONB is to support the rural economy. It has identified that farming is becoming unviable and is presented with a change in land management that will support a flourishing industry. The longer-term impacts of the planting scheme to

select commercially viable species over natives is increasingly important and, when considered together with carbon sequestration, presents a very strong counterbalance to a woodland planted solely for biodiversity composed purely of native species likely to struggle in a changed climate.

It is our belief that in making the decision to support woodland creation that the natural capital overall will be increased. We acknowledge that a trade-off is being made between certain elements, but our decision supports the most long-term sustainable choice of land use for this area. The location of the new woodland immediately adjacent to a substantial block allows carbon sequestration to be performed in a viable volume and with less visual impact than locating the same trees elsewhere across the AONB. The choice to support conifers means that the amount of carbon can be captured in less land reducing the need for larger areas of woodland creation which would potentially cause impact across a wider part of the AONB where trees are not already present.

In summary, it appears the AONB objections rest on three primary elements: biodiversity, carbon and landscape. There are no supporting facts provided for the first two and the views stated run contrary to the prevailing evidence and expert views. The landscape view is subjective and therefore not one that can be responded to with scientific evidence and must therefore be balanced against the positive outcomes of the scheme. As such, we find no justification for declining or further amending the proposal beyond the changes incorporated in the attached revised planting design plan.

Yours sincerely



Zac Sibthorpe

**Woodland Officer
Forestry Commission
South West Area Team**

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