



Cranborne Chase Area of Outstanding Natural Beauty



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Dear Zac

England Woodland Creation Offer EWCG32-21-22 Bonham Plain Wood

1. Thank you for organising the meeting on the 31st March, following the AONB's initial consultation response to the proposal. It was helpful to see the established woodland to the west of the site that has evolved from the planting scheme of 1903. That planting is, of course, on the very different topography of the Greensand Hills. I note that Historic England and Wiltshire Council planning were invited to the meeting, and it was a pity that we did not have their contributions to the discussions. The long-term potential for carbon sequestration and biodiversity were stressed in those discussions. However, it became clear that the continuous cover forestry of the type that we previously visited in the established woodlands to the west is only likely to start to be achieved sometime after the first thinning stage. Until it becomes both practical and economic to take out sufficient stems to create spaces for planting or regeneration the first 25 to 30 years of the planted-up area is likely to appear, both internally and externally, remarkably uniform.
2. I sensed from the discussion that it would be helpful to put on record some relevant information about the AONB designation and this AONB's adopted Management Plan. The latter is, statutorily, the policies of the constituent local authorities for this AONB.
3. 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.

4. 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.
5. 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.
6. 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.
7. 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.*

8. The natural environment is clearly a significant attribute of the 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. [It should be understood that 'clusters' relates to organisational groupings of existing farms or woodlands to plan and implement environmental enhancements]*

***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.*

9. 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*

10. Conserving and enhancing natural beauty cuts 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.
11. 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 \[2018\]](#).
12. The application site appears to be in the Kilmington Terrace landscape character area of the Greensand Terrace 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 can be viewed in full ([High Resolution](#)) on our [website](#).
13. I have taken the opportunity to visit the area again and view the woodland creation site from the northern side. Currently the open and flat expanse of the Greensand Terrace slopes gently towards the south east. It is an area typified by big open skies and long distance views. Admittedly the relatively recent hedgerows break up the expanse, but otherwise views to the other end of the Plain extend to about 1.25 kilometres. Duncliffe Wood is readily identifiable further away and in the eastern and south eastern sectors the downlands provide the skyline. All of those wide-ranging views and the expansive sky will

be eliminated by the proposed woodland planting. Whilst the planting itself might create a more enclosed and sheltered environment it would be remarkably different from the current predominantly open landscape with long ranging views. Furthermore, the Greensand Terrace is open to view from the higher ground of the chalk downlands to the east. A woodland planting scheme of the scale proposed, some 89 hectares, would appear as unusual and alien within the expansive and predominantly agricultural landscape that currently exists.

14. Whilst the AONB Partnership welcomed the Government's 25year Environment Plan it recognised that there are some potential conflicts within it. The encouragement to sequester carbon and to create a more biodiverse countryside conflicts with the desire to maintain a productive agricultural industry that contributes significantly to the nation's attempts to be self-sufficient. The site for this woodland creation project is on agricultural land classified as 'best and most versatile'. All of the national guidance is that such land should be utilised for productive farming in all but exceptional circumstances. I have not seen any statement of exceptional circumstances in the current case and, therefore, the best and most versatile land must weigh heavily in any consideration whether or not to progress with a large scale tree planting scheme.
15. The AONB Partnership is aware of the long and varied cultural history relating to Bonham Farm and the surrounding area. Whilst the wartime use as a strategic airfield is beginning to fade beyond living memory, there are many other significant historical and cultural attributes relating to the heritage assets and the locality. The enclosure of those heritage assets by woodland seems unlikely to provide the conditions whereby the significance of those assets would be better understood and therefore better appreciated.
16. It seems likely, if the proposal proceeds, that the woodland would establish quickly, and the trees would grow to their maximum dimensions because the site is on 'best and most versatile' land. It seems likely, therefore, that the existing open character and the extensive views would be quickly blocked out by the fast growing trees, with over 80% of those being commercial conifers. That substantial growth would provide a significant and dramatic change to the landscape.
17. As I explained at our meeting, a fundamental of AONB designation is the conservation and enhancement of natural beauty. That is predominantly a landscape designation and all AONBs have landscape character assessments which form the foundation of their quinquennial management plans. For this AONB, along with others, major changes to the landscape are generally considered by the environmental impact assessment process. When a full EIA is not deemed to be appropriate, a landscape and visual impact assessment is undertaken. That LVIA takes into account the scale and extent of changes in conjunction with the sensitivity of the location, and is an important piece of work to assist in the formulation of proposals that involve landscape change as well as assisting decision makers.
18. As you will be aware, this AONB Partnership has been quite clear that a proposal of the scale being put forward ought to involve the production of an independent LVIA at an early stage. The reason for doing so at an early stage is to indicate the likely scale and character of change so that time and effort is

not invested if the proposal is likely to conflict with the purposes of AONB designation and the aims and objectives of the adopted AONB Management Plan. LVIAs form an integral part of the consideration of significantly smaller changes to the landscape, such as the provision of 30 houses with structures no higher than 10 metres. The current proposal involves the planting of over 80 hectares of trees, many of which have the capacity to grow to 40 metres in height.

19. The AONB Partnership has consistently expressed its concerns about the scale of the proposed woodland planting that conflicts with the landscape character of the Greensand Terrace landscape character area. If an argument is to be put forward in favour of the proposals, then a landscape and visual impact assessment would be a key part of that process.
20. The professional expertise available to the AONB Partnership judges that the proposed woodland creation scheme of the scale set out will significantly change the character of not only this part of the AONB, but also this part of the landscape character area. Governmental guidance is quite clear that it is inappropriate to consider the change in one location of the AONB in relation to the whole of the AONB. Any changes should be considered in relation to the part of the AONB where they are occurring.
21. In that context, it is necessary to understand that the woodland areas to the west and northwest of the site are within the Greensand Hills landscape character area which has very different characteristics, other than broad geology, from the Greensand Terrace. It is, therefore, fallacious to suggest that the sharply undulating topography within incised valleys, which is difficult to farm, is more or less the same as the site of the proposed woodland creation scheme.
22. Having considered the scale of the landscape changes and the impacts on not just the views across the area but also views of the area, the AONB Partnership is acutely aware that the proposed forest landscape is fundamentally one of enclosure, whereas the existing landscape of the Greensand Terrace is fundamentally open with expansive skies and long distance views. The Partnership is also mindful that the proposed planting would have impacts on heritage assets in and around the site.
23. On the other hand, the Partnership acknowledges that ultimately the scheme could contribute a crop of timber on an ongoing basis, as well as contributing substantially to carbon sequestration and biodiversity. That would, however, be at the expense of a meaningful area of the country's best and most versatile agricultural land.
24. The AONB Partnership is also mindful that in one of the nation's most important landscapes a governmental body is considering a substantial development without the benefit of an independently undertaken landscape and visual impact assessment. Not only is the lack of that LVIA a major shortcoming in the planning and decision making process but that lack also indicates that the Forestry Commission would be in breach of its duty under section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purposes of AONB designation in all its decisions in relation to activities that would affect land within this AONB. The AONB team have sought to encourage the

landowner, consultants, and the local Forestry Commission staff to follow good practice in relation to developments within an AONB.

25. On the basis of the information to hand the AONB Partnership does not support the proposed planting scheme either in principle or in detail. The woodland planning process appears to the Partnership to be flawed and that the scale and nature of the landscape changes to this part of the AONB would conflict adversely with the identified landscape character and sense of place. **The Cranborne Chase AONB Partnership does, therefore, strongly object to the proposal as currently presented.**

26. I realise that will not be the conclusion you are looking for, but it is important that the Partnership's position is both clear and not misunderstood.

Yours sincerely

Richard Burden

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