

4 June 2009

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Dominic Driver  
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Dear Dominic

**Restoring and expanding open habitats from woods and forests in England  
Consultation March 2009**

Thank you for allowing the Cannock Chase Area of Outstanding Natural Beauty (AONB) Partnership the opportunity to comment on the consultation document on restoring and expanding open habitats from woods and forests in England. The comments on behalf of the Cannock Chase Area of Outstanding Natural Beauty (AONB) Joint Committee are set out below.

As you are aware, the AONB is a statutory designated area under the Countryside and Rights of Way Act 2000 (CROW). CROW places a duty on all public bodies to "have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty". The Cannock Chase AONB Management Plan, prepared in accordance with CROW, sets out how the AONB will be conserved and enhanced.

Within the Cannock Chase AONB, the Forestry Commission has extensive land holdings and is represented within the Partnership management structures.

Bearing in mind this context and the Partnership's specific perspective within an AONB, I would also like to add the following comments.

**General Comments**

Whilst making general reference to designated areas other than SSSIs, the document does not acknowledge statutory designations such as AONBs. As noted above, there is a legal duty to protect them within the work of managing woods and forests in England. It would therefore be helpful to take landscape

scale designations (particularly statutory ones) and landscape scale management into account within the overall choice of policy.

### **Detailed Comments**

p16 – “Quality of life and landscape” – If there are likely to be significant changes in the landscape, then the impact score should not be “little”. This level of impact within an AONB would be significant and every legal duty towards the landscape and habitats would have to be appropriately balanced before the introduction of such significant change.

p20, Q2 – Landscape character and quality need to be a consideration within the list of desired outcomes, especially within designated areas such as AONBs. An additional desired outcome would therefore be that landscape character remains uncompromised.

p25, Q7 – Whilst local participation in decision making can be resource-intensive and time consuming, on-going local engagement backed up by specific consultation events appears most appropriate.

p25, Q8 – Prioritisation at a regional would be appropriate for this policy. This would enable wider-scale initiatives, such as Biodiversity Enhancement Areas, to have a positive impact within local contexts.

p34, Q17-18 – As noted above, a landscape scale approach linked to landscape character would need to be used to ensure that a more dynamic approach to land management could be balanced against considerations other than SSSIs.

p43 – As noted above, policies already enshrined within statutory processes, such as AONB Management Plans, would also have to be accounted for and relate/link to this policy.

I do hope the comments help the development of your policy. If you have any queries about the comments please contact me.

Yours sincerely,

A handwritten signature in black ink that reads "R. J. Hýtch". The signature is written in a cursive, slightly slanted style.

Ruth Hýtch  
AONB Officer