

Woodland Trust Proposals for a forestry project at Langley Vale to Create Native Woodland

Application for Consent under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999

Background and Statement of Reasons Supporting Decision to Grant Consent

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Glossary

Term/Acronym	Definition
ES	Environmental Statement
FC	Forestry Commission
EPS	European Protected Species
SSSI	Site of Special Scientific Interest
EIA	Environmental Impact Assessment
ASNW	Ancient-Semi Natural Woodland – land that has been woodland since ~1600.
Opinion	The process whereby FC, as the Competent Authority, give their opinion as to whether a project is a relevant project under the EIA regulations and whether it will require our consent.
Determination	The decision FC ultimately make, as the Competent Authority, on whether to give consent for a relevant project under the EIA regulations.

Scoping	A process used to help determine if a project will have a significant effect.
Screening	A process used to help determine if a project will have a significant effect
APZ	Arable Plant Zone

Purpose

1. To explain the background to the Forestry Commission's decision to grant consent (subject to conditions) to the above application. This will include the main reasons and considerations on which the decision is based and describe, where necessary, the main measures that have been agreed to avoid, reduce and offset the major adverse effects of the project.

Site and ownership

2. Langley Vale is in Surrey to the South of Epsom and is owned by the Woodland Trust.

Legislative Background

3. The Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999¹ ("the EIA (Forestry) Regulations") prohibit the carrying out of any work or operations in relation to a "relevant project" unless consent has been obtained from the Forestry Commission or, on appeal, the appropriate Authority (in England, the Secretary of State for Environment, Food and Rural Affairs).
4. Regulation 3 defines a "relevant project" as one of four types of forestry project:
 - Afforestation;
 - Deforestation;
 - Forest road works;
 - Forest quarry works

which does not constitute development regulated by the EIA legislation on town and country planning but which is likely by virtue of factors such as its nature, size or location to have significant effects on the environment.

5. An application for consent for a project at Langley Vale under the EIA (Forestry) Regulations was submitted to the Forestry Commission on 8th July 2016. This included an Environmental Statement setting out the project, the likely impacts on the environment and the proposed mitigation measures.

Application Details - Environmental Statement

<http://legislation.data.gov.uk/ukxi/1999/2228/made/data.htm?wrap=true>

6. The Forestry Commission first met the Woodland Trust at Langley Vale in May 2014 to look at their initial proposal. The proposal was to create an area of new woodland and manage unplanted areas as open habitat.
7. The applicant proposed to plant 145ha of woodland, and manage 60Ha as open areas. The remaining 55ha of the 260ha site is existing woodland.
8. The Forestry Commission received the EIA Opinion enquiry form in August 2014, followed by supporting reports in September, October and November. The proposal was screened in November 2014 prior to receiving a report on the flora present. Concern about the impact on birds and arable flora from various experts led to further iterations of the proposal, but ultimately there was insufficient confidence that the proposal wouldn't have a significant impact on various factors. In September 2015 the Forestry Commission wrote to the Woodland Trust informing them that the project to create new woodland at Langley Vale would need consent.
9. The scope of the Environmental Statement (ES) was agreed in December 2015 after a scoping meeting involving a wide range of invited stakeholders and a public event held at a local venue held as a drop in session on a Saturday in late Nov 2015.
10. A draft ES was submitted to the FC on 10th June 2016. FC comment was fed back to the Woodland Trust on June 30th. The application for EIA (Forestry) Consent and the Environmental Statement were submitted to the Forestry Commission on the 8th July 2016.
11. The application for EIA (Forestry) Consent and the Environmental Statement were subject to a 28-day public consultation starting July 15th 2016 . Notices of the proposals were published in 2 local papers with copies of the Environmental Statement available for the public to view at the Forestry Commission offices at Bedgebury, the Woodland Trust offices at Grantham and at Tattenham library. Notices were also placed on the site, and emails were sent to those on the Woodland Trust stakeholder list (which included those who were invited to the scoping meeting). The local authorities and Natural England were sent a formal consultation letter.

Langley Vale- Application for EIA Consent: Key Dates

Date	Stage in EIA Process	Relevant Section of EIA (Forestry) (England and Wales) Regulations 1999 (Statutory Instrument 1999 No. 2228)
8/5/2014	Initial site visit FC and WT	In part for purposes to interpret a relevant project under regulation 3
15/8/2014	Opinion request form received by FC	Regulation 5
24/11/2014	Screening exercise started ahead of receipt of ecology report	
Jan to July 2015	Design versions 2, 3 and 4 considered	
11/9/2015	FC informed WT that consent is needed.	Regulation 6
26 th and 28 th Nov 2015	Scoping meetings held	
11/12/2015	Scoping report agreed	
10/6/2016	Draft ES received by FC	
8/7/2016	Final ES submitted to FC	Regulation 10
15/7/2016	ES advertised, sent to consultees and stakeholders.	Regulation 13
15/8/2016 to Oct 2016	Determination	Regulation 15
7/10/2016	Notification of decision	Regulation 16

National and Local Policy Context Relating to Langley Vale

12. National and regional policy documents provide a general context for considering applications under EIA (Forestry) Regulations. They help to inform the decision by setting down the contemporary standards that should be applied when determining whether or not an environmental impact is likely to be significant.
13. The Government's approach to sustainable forestry is underpinned by the **UK Forestry Standard** (3rd edition, 2011).² The Standard, supported by its series of guidelines, outlines the context for forestry in the UK, sets out the approach of the UK governments to sustainable forest management, defines standards and requirements, and provides a basis for regulation and monitoring.

² <http://www.forestry.gov.uk/ukfs>

14. The Government forestry policy statement³ highlights the need to bring more woodland into active management and increase the extent of woodland cover in England. There is a Government commitment to planting 11 million trees by 2020.
15. Biodiversity 2020 is a national strategy for England's wildlife and ecosystem services and highlights goals to more, bigger and less fragmented areas for wildlife – an increase in priority habitats.
16. Langley Vale is in Surrey county and falls within 3 local authorities – Epsom and Ewell, Mole Valley and Reigate and Banstead.
17. Relevant parts of Surrey County Council policy include rights of way, and health and well being through the promotion of active and healthy life styles and tourism which encompasses walking and the natural environment.
18. Policies of the 3 local authorities include creating a quality environment, enjoying active lifestyles, maintaining and enhancing the environment and green space for the future. Enhancing open spaces, creating new ones and providing access to them is also highlighted.

Summary of Consultation Responses

19. The application for EIA (Forestry) Consent and the documents accompanying the application, including the Environmental Statement, were subject to a consultation period during July and August 2016. For the consultation exercise a notice was published in the Surrey Comet and Dorking & Leatherhead Advertiser. The notices advised members of the public that the Environmental Statement and associated documents could be viewed by members of the public at the Tattenham Library, FC offices at Bedgebury, Woodland Trust offices and on the internet. The notices stated that anyone who wished to make representations about the application should write to the FC within 28 days.
20. The FC provided Natural England (NE) with a copy, and wrote to the relevant local authorities to inform them of the consultation. A request was made for any representations regarding the application to be sent in writing to the Forestry Commission within 28 days.
21. The public consultation exercises received a total of 14 responses. These responses included 2 from statutory consultees and 12 from other organisations and members of the public. A total of 144 issues were raised although many issues raised were similar in nature. Each individual response was analysed in detail and the individual issues raised by the consultees were considered.
22. The issues raised by consultees and the Forestry Commission's responses are summarised in the attached Table 1.

Issues Raised by Consultees

23. Some of the issues raised were of a general nature and weren't relevant to the EIA as such.

³ <https://www.gov.uk/government/publications/government-forestry-policy-statement>

24. Three areas raised the most concern about negative impacts: flora - the impact on arable flora which makes the site Nationally important; fauna – the impact on ground nesting birds, most notably lapwing and skylark; and landscape – the change from a farmed landscape of arable production to one with a higher coverage of trees. There were additional concerns around the loss of heritage and the impact of losing food production in relation to carbon and climate change.
25. Positives were also identified, with the open access policy of particular note. Although there was one submission that differed from this general view, it needs to be emphasised that the ES is based on the premise of no car park or visitor centre, and therefore relatively low numbers of people.
26. In reaching its decision the Forestry Commission has sought to put in place a series of conditions that it is felt will ensure there is the strong likelihood of a significant net gain in the floristic interest of the site and a small impact on the fauna. Some aspects of the conditions will also help preserve the landscape.

Basis of the EIA Determination

27. The EIA determination process provides the framework for assessing whether the project will have a significant impact on the environment. The decision on whether or not to grant consent takes account of the environmental impacts of a proposed project and takes into consideration the environmental information, representations received in relation to the application and any other material consideration. In particular these include the assessment of direct and indirect effects of the project on the environmental factors listed in Schedule 4 to the EIA (Forestry) Regulations.
28. Whether or not afforestation proposals gain EIA (Forestry) Consent is determined on a case by case basis and depends upon whether the net environmental impact of the project, i.e., the balance of negative and positive effects, is considered by the Relevant Authority (the Forestry Commission) to be significant.
29. In evaluating the effects of the proposed afforestation a number of criteria have been used including:
 - The degree of change in environmental conditions;
 - The scale, extent and duration of the project;
 - The number of people and of other receptors affected;
 - The value and scarcity of the resources affected;
 - Whether the proposal results in any breach of environmental standards;
 - Whether any protected sites or features are affected;
 - The probability of the effect occurring;
 - Whether the effect is permanent or temporary, reversible or irreversible, continuous or intermittent; and
 - Whether it will be feasible to avoid, reduce, remedy or compensate for the effect.
30. The following paragraphs outline:

- The main reasons and considerations on which the decision is based;
- A description, where necessary, of the main measures to avoid, reduce and, if possible, offset the major adverse effects of the project; and
- The conditions which are attached to the approval.

Assessment – the main issues considered in determination of the project

31. Schedule 4 of the EIA (Forestry) Regulations 1999 require the competent authority (in the case of afforestation, deforestation, forest roads or forest quarries this is the Forestry Commission) to consider the impacts of the proposals on:

- i) Flora and fauna;
- ii) Soil, water;
- iii) People, access and recreation;
- iv) Archaeology and heritage;
- v) Landscape;
- vi) Climate; and
- vii) The interaction between the factors mentioned above.

The issues are described in more detail in the following sections.

Flora and Fauna

32. The Environmental Statement (ES) considered the impact of the proposal on natural habitats, breeding birds and on protected species. It includes ecological surveys of the site which included bat, dormouse and badger surveys, a herptile survey, bird survey and vegetation survey.
33. Regarding arable plants, both the presence of rarities and the assemblage are recognised as important and of high conservation value. The ES found that the impact of the proposal on arable plants will be moderate and positive at implementation and in the longer term will be major and positive. The ES did recognize that the magnitude and location of impact is difficult to predict.
34. While it is accepted that most of the proposed planting under scenario A avoids the known locations of arable plants from recent surveys, it does fail to respect some recorded locations. The result would be significant for the local population of night flowering catchfly (*Silene noctiflora*) and so the planting plan attached to this notice has been changed to further reduce any direct impact through tree planting.
35. The space available to arable plants under the project represents a substantial increase in the potential area compared with the area of field margins where the plants are largely confined to at present. However, in order to make sure that potential is realised, the management needs to vary and it needs to adapt to changing or unpredictable responses. It is also a specialist area of expertise. The direction of that management will be best served through an advisory group of independent experts that will help advise on management prescriptions for open habitats. There will also be a condition that a management plan for the open habitats will be agreed within the first 12 months.

36. There was concern that the soils in the arable plant zones may be nutrient rich with the result that light cultivation and cutting is likely to result in a grass sward and or weed problems. Advice is that this could be dealt with by cropping the land without any inputs. A condition has been included to this effect after there has been some nutrient analysis.
37. Chalk grassland is considered in the ES as an open habitat. The overall area of the habitat increases with existing habitat being retained. The introduction of appropriate management means that the impact during the implementation phase is moderate and positive and that in the longer term the impact will be major and positive. This is seen as an accurate assessment of the impact, but to realise that positive impact will need good management. There was some concern about the seed mix suggested within the ES, and so the advisory group should have a role in advising both on the method of establishing the chalk grassland and its subsequent management so that there is the greatest likelihood of the medium to long term impact being major and positive.
38. Hedgerows are also assessed in the ES. During implementation all the hedgerows will remain as a feature (until some are overshadowed by the new woodland) and the ES found the impact to be insignificant. New hedges will also be planted during the implementation phase which is seen as a major and positive impact. During the establishment phase, hedgerows will be lost as the new woodland grows and the ES finds this to be low and negative impact changing to moderate positive at maturity.
39. The impact of the loss of hedges is probably moderately negative when the invertebrates are considered. While the existing woodland is supporting some important species and a good assemblage, there are rarities present in the hedges. There will be an increase in habitat for woodland invertebrates in due course, but this is at least countered by the loss of hedgerow habitat. The report on invertebrates lacks any special basis and so the location of the main populations is unknown. It is quite likely that the use of shrub species and open ground within woodland and possibly the routes of footpaths could be placed so that the loss of hedges through woodland growing over them is minimised where there are important invertebrate populations. The surveys found that there were very few records from the arable fields and so the change in their use seems unlikely to have an impact. There is there a condition placed that requires the mapping of the invertebrates recorded and the production of a detailed planting plan that uses shrubs and open space to reduce the negative impact of hedges being lost and the resulting negative impact on invertebrates being minimised.
40. Two species of protected ground nesting birds are important on the site – skylark and lapwing. The ES recognises that they are present and describes the fact that lapwing are located in their optimal habitat in one field which will be planted under option A or B. It goes on to describe how an alternative field is suitable and can be made more so through some hedge coppicing. In terms of skylark, there are a number of territories shown in the ES which also indicates that a number will be lost. However the ES goes on to say that changes from arable farming to conservation management should improve the breeding success rate.
41. Although there has been a visit by an ornithologist to look for lapwing in April 2016, the recommended visit later in the spring either wasn't completed or has been excluded from the ES. One submission from the consultation does note

that several lapwing were using the site and nesting. The assumption is that lapwing are using the site. They are of course mobile and able to use other areas. A large field is being left unplanted and is thought to be suitable for lapwing. Although not as optimal as the field currently used, the improved timing of operations (advised by the advisory group) and lack of farming inputs the impact in the short term is thought to be neutral rather than positive.

42. Skylark are present at the site, with 30 territories being recorded in 2014. While the ES sees the impact on birds as positive, the area available to skylarks is reduced from the current level. While numbers of territories may increase in the short term it is bound to be a short term gain and long term loss of territories as the planted trees establish and close canopy. However, some expert advice is that the change from arable production and winter sown crops to conservation management is likely to produce a better quality of habitat and improved breeding success compared with the current situation. While the short term impact could be positive overall for ground nesting birds it is difficult to see this as a positive impact in the long term and is more likely to be neutral.
43. In response to the loss of territories for skylark, some changes to the planting proposals have been made and these are reflected in the planting map attached to this decision.
44. An assessment of impact on woodland birds is also included. Marsh tit, a red listed species, is noted as being present in woodland on the site. The new woodland is seen as having a neutral impact on the marsh tit but that as the woodland matures, the long term impact is high and positive.
45. There are potential gains in woodland birds such as marsh tit although this will be a long term possibility and will not be realised until the new woodland develops into a suitable habitat.
46. A survey of bats has been carried out with 5 species being recorded. The survey concludes that the large areas of arable crops aren't supporting bats, and that the hedges, woodland and woodland edges are the main habitat that bats are using. The early phases of implementation are seen as being of a low positive impact through increased foraging opportunity but with no additional roosting, the impact is likely to improve as the woodland matures. There will be more potential bat roosts in the woodlands, and management of open areas will provide more habitat for invertebrates resulting in a major and positive impact in the long term.
47. This is a reasonable assessment with the APZ's, new woodland and chalk grassland likely to produce better foraging for bats than the intensively managed arable crops with the additional long term gain of potential roost sites.
48. The invertebrate study shows the site to currently support an important assemblage and some rarities. The 2 habitats that are important are the existing woodland and the hedgerows. The reduction in farming inputs will have a moderate and positive impact as will the maturing woodland habitat. The report does highlight the loss of hedgerows through the planting. The impact of this and associated condition are found in paragraph 39.

49. Badgers are present on the site. The ES recognises that the greatest risk of disturbance is through visitor access, although this is balanced by a reduction in arable cropping and use of machinery so the overall effect is seen as neutral. The establishing woodland has the potential to increase the area of undisturbed habitat and planning footpaths to minimise disturbance offers some mitigation and a resulting moderate and positive impact in the long term.
50. While this assessment is accepted, the fencing proposed to manage livestock could easily be damaged by badgers, which in turn risks dogs entering the enclosures during bird nesting periods. A condition states that badger gates will be included in any new fences where there are badger runs.
51. Dormice weren't found on the site during surveys.

Soils and Water

52. A soil survey was carried out which gives great detail about various aspects of the soils and geology. The conclusion in the ES is that the free draining soils may restrict species choice, but that the soils are suitable for woodland planting which will also stabilise the soils compared with arable rotations. The creation of chalk grassland is also suitable for the site.
53. There are no water bodies close to the site and the ES concludes that the risk of surface flooding is very low and trees will help slow down surface run off and so reduce the risk further. Reductions in farming inputs will also reduce the risk of nitrates entering the ground water.

People Access and Recreation

54. The ES considers the impact of the project on wildlife through access by up to 10,000 people. It should be noted that the woodland ES considers only informal access without a visitor centre or car park and a restricted unsurfaced path network. The development of those features and their impact will be through a planning application and associated ES.
55. Disturbance to wildlife by increased access and the impact of dogs on wildlife and grazing animals are a risk with the site being open access. The ES describes measures to reduce the risk through control zones which will be put in place at key times from the start of the project.
56. Litter has the potential to become a problem with increased access, but as the ES considers only visitor levels at about the current level, litter is not expected to be a problem.
57. Racehorse training is a feature of the area as is recreational horse riding. No new horse riding routes are considered in this ES, but will be in an ES as part of a planning application for various visitor facilities mentioned above.
58. Overall, the impact on people access and recreation is assessed as moderate and positive.

Archaeology

59. A desk based study and targeted magnetometry survey were carried out. The areas of interest were limited to a strip lynchett, possible practice trenches and a flagpole erected in the First World War in an area used for gas training. The area of the lynchett will be kept clear of planting and natural regeneration. Open space will also be kept around the area of possible trenches. Retention of the flag pole, if not possible as a vertical feature will be displayed as a horizontal feature.
60. Hedgerows within the site are described as ancient but it hasn't been possible to confirm their age. Although none are removed, some will be lost as they are integrated into the new and developing woodland. In scenario A 770m of hedgerow is integrated into woodland, or lost while over 1000m of new hedgerow is planted.
61. A condition will ensure that a greater proportion of the currently existing hedgerows will remain as a feature by the use of shrub species and open ground with woodland plantings being used as described in paragraph 39.
62. Although the assessment in the ES at 7.1 assesses the overall impact as medium it does not suggest if this is positive or negative. It is felt that putting in place the condition of leaving some hedges in shrub areas or within open ground within woodland will be a moderately negative impact.

Landscape

63. The effect of tree planting on landscape was raised as a point of concern at the scoping stage, although it should be pointed out that the main point supporting planting (in the ES table at 8.1 p 114) and the criticism that the landscape report at the scoping stage was not fit for purpose was made by the author of the landscape section of the ES. It has therefore been necessary to consider this section bearing in mind that the author possibly had a pre-determined view about tree planting.
64. The ES considers the visual effects of the project through a landscape visual assessment (LVIA) which is carried out in accordance with current guidelines (GLVIA3)
65. The assessment recognises the Area of Great Landscape Value (AGLV) and the reasons that it wasn't included as part of the AONB
66. The landscape elements are analysed and broken into descriptions of small woodland and copses, hedgerows, pony paddocks and horse infrastructure, fields and historic field pattern. The assessment goes on to describe the tranquillity and the landscape as a recreation resource, pylons and suburbanisation.
67. The effects of the project on the landscape are assessed against the above. The impact is assessed as slightly to moderately beneficial except for the impact on hedgerows and field patterns which are assessed as moderately adverse.

68. The assessment includes visualisations of principle views from outside of the site looking in, and are largely looking across the site.
69. The assessment concludes that there are no significant landscape reasons that would preclude the creation of woodland at the 70% woodland cover scenario in terms of visual impact.
70. There is some doubt about this assessment in that it doesn't include views that look along the more open aspects of the site. The consultation brought comment that people enjoy the open nature of the site and while it is agreed that views from outside and looking across the site have a wooded appearance, the closer views along the valley are open and would be impacted by tree planting. The assessment also puts some weight on the benefit of obscuring the influence of suburbanisation and built environment, but aspects of this – the views to London and to the race course are part of what people know and understand as part of their environment.
71. The Forestry Commission view is that a higher level of planting would have a significant negative impact on the landscape. The lower level of planting as in scenario A means that planting can largely be on the ridges and provide opportunity to keep the open valleys open.
72. There is also concern that the fencing of enclosures for grazing may produce some adverse impact. The use of shrubs and varying stocking densities within the planting areas will avoid such negative impacts and so the condition to produce a planting design for FC approval prior to any planting each year is included.

Climate

73. Using the carbon code, the ES makes an assessment of the scenario A planting proposal and compares the CO₂ uptake to the baseline of a no change scenario. The calculations shows that scenario A will serve as a carbon sink and make a moderate and positive impact in reducing carbon levels in the atmosphere.

The Interaction of impacts

74. With a number of important aspects to the site – flora, fauna and landscape primarily, one positive impact can result in another negative impact.
75. The FC considered that the scenario B of planting a larger area of new woodland would have a negative impact on multiple aspects such as ground nesting birds, arable flora, invertebrates and landscape.
76. The scenario A proposed included monitoring of some fields with a view to tree planting after 5 years if there were no flora features of interest that appeared in that time. The result would be scenario B. This, it is felt addressed only one aspect – that of arable flora and didn't take into account the important birds using the site or the landscape, both of which would have been compromised even if there was no particular floristic interest.

Summary and Conclusions

77. In considering whether to grant consent for the proposed project the Forestry Commission's primary concern has been to establish whether the project would result in any significant environmental impacts on the factors listed in paragraph 31.
78. In evaluating the effects of the proposed afforestation the Forestry Commission has used the criteria listed in paragraph 29.
79. The information contained in the Environmental Statement has been examined in detail, consultees responses have been investigated and expert advisors engaged to advise on some issues and help determine whether evidence presented by the applicant in the Environmental Statement was fit for purpose. The conclusion of this process was that the evidence presented in the Environmental Statement was sound and of an adequate standard on which to base consideration of the impacts of the project.
80. The environmental impacts resulting from the afforestation through planting and natural regeneration and the management of open habitats in the project were considered in detail.
81. In cases where the adverse environmental impacts of the project may be considered significant in terms of EIA impact thresholds it would be necessary to consider positive impacts of the project very carefully in order to determine whether the benefits outweighed the negative impacts. However, in this case, as the overall environmental impact of the project is not significant in terms of EIA impact thresholds it has not been necessary to consider the wider environmental benefits of the afforestation in detail. Nevertheless the analysis of the ES and consultation responses established that the afforestation has the potential to provide net benefits through increased area of open habitats managed for conservation, habitat restoration and creation, better access opportunities and by respecting the archaeological features identified.

Forestry Commission Decision

82. Having considered the Environmental Statement, national and regional policy contexts, advice received from statutory and other bodies and the views of consultees **the Forestry Commission has approved the application for consent subject to the conditions below.**

Conditions of Consent

83. Condition (a): The proposals hereby permitted shall be commenced before the expiration of two years from the date of this permission.

Reason: To ensure the afforestation and open space management is commenced within a reasonable period of time from the date of the permission.

84. Condition (b): No work shall be carried out in relation to the relevant project after the expiration of ten years from the date of this permission.

Reason: To ensure the project is completed within a reasonable period of time from the date of the permission and the information gathered to support the ES

85. Condition (c): Works relating to the afforestation hereby permitted shall not be carried out otherwise than in accordance with the plans and specifications approved by the Forestry Commission unless otherwise agreed in writing with the Forestry Commission. This consent relates to the application as amended by the revised layered planting map, and relates only to scenario A, without the option to plant areas monitored for 5 years which would require a further request for an opinion under EIA regulations.

Reason: To ensure the afforestation is as per the EIA (Forestry) application and to enable control to be exercised over the project as it proceeds.

86. Condition (d): Within 6 months of this decision an advisory group of independent experts able to advise on open space management to benefit the flora and fauna of the site will be set up and terms of reference agreed. The duration will be at least 5 years and no more than 10.

Reason: The rare arable flora and assemblage are predominantly present in field margins and so occupy a small area. Any incorrect management could result in a decline that has the potential to be significant. Conversely correct management that adapts to response should result in significant improvement. The management for arable plants is a specialist role and will need to be adapted on the basis of responses each year from advice of experts.

87. Condition (e): Monitoring of arable plants for at least 5 years and no more than 10 years from the date of this decision that informs the advisory group must include work by a suitably qualified practitioner agreed by the FC and won't rely on the monitoring done by volunteers.

Reason: While the value of engaging volunteers isn't underestimated, it is important that reliable data collected in a consistent and repeatable manner. This is best through an expert with volunteer data being used as support data rather than primary data.

88. Condition (f) Nutrient assessments of fields designated as arable plant zones will be carried out to determine if it would be beneficial to crop and reduce nutrients in order to create conditions for arable plants. This will be started within 12 months of this decision to inform the advisory group on future management of each zone.

Reason: The additional area potentially available to arable plants is more likely to be unsuccessful if they are nutrient rich and prone to becoming grassland. Cropping will provide overwinter stubble conditions while arable plants establish and later provide overwinter feed for birds.

89. Condition (g) Hedges that are important for non woodland invertebrates should be identified and where they would be incorporated into woodland, open space and shrub planting will be identified in the planting plan (see condition (n)) and used to keep the hedge open.

Reason: The invertebrate survey identified the hedges as hosting a number of rare or scarce species. Without knowing where the hedges important for non woodland species are there is a risk of loss of species and reduction in the assemblage.

90. Condition (h) The cherry avenue will be positioned to avoid any negative impact on known locations of arable plants as shown in the ES.

Reason: There are some rare plants that could be impacted if the avenue is located unsympathetically.

91. Condition (i) A management plan for the existing woodland and newly planted woodland will be produced and agreed with the FC within 12 months of this decision.

Reason: An even aged woodland wont deliver the bio diversity benefits of woodland with a range of ages and woodland types. A plan can help identify opportunities to create diversity.

92. Condition (j) A working management plan for the non woodland habitats (arable plant zones, arable margins and chalk grassland) will be developed and implementation started within 12 months of this decision and reviewed and agreed with the advisory group at least annually.

Reason: The open habitats are central to the impact of the project being positive. A clear plan that can adapt to responses on the ground and be agreed with an expert advisory group is most likely to avoid loss of plant rarities and assemblage.

93. Condition (k) Badger gates will be put in fenced enclosures on any badger runs.

Reason: Badgers will damage fences if access is blocked. In doing so they will allow dogs to get in and potentially disturb ground nesting birds.

94. Condition (l) Arable plant margins identified on the layered map will be at least 50m wide and include at least 20m of open ground and no more than 30m of low growing shrub species.

Reason: Arable plants need a clear open habitat that isn't over shaded by trees.

95. Condition (m) A planting plan showing or describing internal open space and location of shrub species will be produced prior to each year's planting and agreed with the FC.

Reason: Some aspects of landscape impact, and impact on flora and fauna need to be considered in terms of how the planting is executed. The ES give an overview of planting areas but doesn't include important detail of how the planting will be executed.

96. Condition (n) Seeds from important arable plants (after expert advice and any necessary consents) will be translocated to new locations if the advice of the advisory group is that the current known location (from survey works subsequent

to this decision) is likely to be compromised to the extent that a species could be lost from the site.

Reason: The arable plants could appear in places that are less than ideal and translocation will give more certainty about their sustainability.

Forestry Commission
13th October 2016

Table 1 Issues Table

Response No.	Issue number	Source of Issue	Organisation	ES Chapter Para	Objection/Opinion Specific Issue	FC response
1	1	Consultation	Private individual		Owner not maintaining Shepherds Walk bridleway properly	The condition of the bridleway is managed by Highways at Surrey CC and is not relevant to the EIA. The tree planting and land management changes have no impact on this.
	2	Consultation	Private individual	6.1	Asserts that the claim that horse training is important isnt backed up with evidence.	There is no claim about economics in 6.1. Not relevant
2	3	Consultation	Private individual	Non Tech Summary	Skylarks. Never heard of 4 breeding attempts and productivity declines after 2 attempts.	The main consideration is the extent of habitat change and the impact on numbers and breeding success rather than the number of breeding attempts.

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	4				Skylark territories decline from 30 to 6 or 7 under scenario A or B	There seem to be some differing views on the changes in skylark habitat and breeding success. The ES shows territories are likely to be lost to tree planting but the quality of the habitat remaining, with appropriate management could increase to hold more territories than at present and breeding success could be higher. The current management of intensive winter arable crops limits the area available and the success due to crops growing over nesting areas.
	5				Lapwing - 6 pairs is not a small colony and nests destroyed in WT ownership.	Ref to nests being destroyed isn't supported by facts and so cant be considered as relevant and is also reversible with appropriate future management
	6			2.7.2	Priority habitats will be lost, may benefit chalk grassland flora but not ground nesting birds and woodland types may benefit (in 5-100yr period)	At present the space available as habitat for arable plants is primarily restricted to field margins. Ground nesting birds will have less area but potentially higher quality

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	7			2.7.3	To create an inspiring place. People can do so more now as views will be less inspiring.	Views from high parts of the site outwards are largely kept but the points at which views become available may be more restricted. Internal views will change to some extent particularly under scenario B
	8			2.8.1	Without shrub planting some skylark territories will be retained.	The scrub planting and natural regen overlay some skylark habitat although scenario B has a greater impact. The consideration of habitat quality and management as in issue 4 above are a consideration
	9			2.8.7	Growing perios for weed species like cleavers is March to July when no mowing but will prevent bird nesting. Could be large scale problem based on evidence of planted area.	Early indication is that weed species such as cleavers and barren brome could be a problem. The advice from Plantlife is to plough to bury the seeds and consider a ley. This it is thought will reduce problem species at a more suitable time of the year
	10			2.1.4	Only scenario D will ensure no loss of biodiversity	Keeping the status quo will keep what is currently present but offers no opportunity for improvement.
3	11	Consultation	Parish		Prefer option which retains more open ground	This expresses a preference for scenario A

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	12				Would like a footpath link between Headley and Tadworth into Gt Hurst Wood	This is for discussion with the WT and not an impact of tree planting
4	13	Consultation	Private individual		Welcomes acquisition for nature conservation	
	14				Fails to respect historically mixed character of the open landscape	The scenario B planting has been rejected partly on landscape grounds
	15				Fails to recognise the primary importance of preserving assemblage of plants from arable tillage.	It is felt this is recognised and in addition, the conditions will ensure appropriate management for arable plants will be put in place.
	16				Fails to take responsibility to contribute to food production	
	17				Good to consolidate woodlands and link them with shaws and hedges	

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	18				Most of the woodland creation does violence to the conservation priorities of the farm.	Most of the proposed woodland creation is replacing arable production and in effect has little impact on the conservation priorities of the farm. The priorities for conservation of arable plants and ground nesting birds are recognised as important. Ensuring the management of arable plant zones and chalk grassland is optimised for flora and fauna has the potential to improve the conservation values on the farm.
	19				Supportive of open access policy	
5	20	Consultation	Conservation Organisation		Scenario B creates a landscape out of context for the county	Scenario B hasn't been consented
	21				A monoculture of age class will be created	Accepted but other aspects mean that the site will have a range of age classes – the condition to have a management plan on the woodland will also mitigate against this.
	22				5 years not enough to understand impact of tree planting	The 5 years of monitoring will be in place, but any further planting would be subject to an EIA opinion
	23				Inadequate timescale allowed for fauna to colonize rapidly changing environment	See above

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	24				Closing canopy will have a negative impact on lepidoptera	Overall, the woodland areas have a rich assemblage of invertebrates generally. The report also indicates that the hedges are important and so scrub margins to woodland are important. Scrub planting and allowing areas to regenerate naturally will help in this respect. There is some loss of hedgerow but this is gradual as new woodland develops, and additional edge and hedgerow planting is accommodated. It is noted that some rarities are in hedgerows. There is a condition relating to hedgerows that will mitigate against loss.
	25				No elms included for white letter hairstreak	Elms are still subject to being affected by Dutch elm disease. There are elm suckers in the area, but planting native elm is unlikely to be successful.
	26				Hawthorn an invasive spp on chalk grassland so shouldn't be in planting mix	The chalk grassland will be managed and scrub control will need to be carried out. Hawthorn is present locally and so would colonize even if it wasn't included in the planting mix.

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	27				woodland areas unlikely to benefit woodland butterflies. Not doing anything to recreate WW1 conditions and management to stop further degrade	The new woodland could include open space as rides and glades which would produce conditions suitable for woodland butterflies. The condition to have a management plan and planting plan for the woodland will ensure this is considered
	28				Mitigate by creating woodland conditions for butterflies and moths	Use of shrubs and varied edge structure will help create a range of habitats and conditions
	29				Loss of hedgerows and the habitat they offer butterflies	It is recognised that the hedgerows are important for invertebrates and a condition has been applied for further work in this area.
	30				Welcomes increase in chalk grassland	
	31				Seed mix not typical of chalk grassland	The advisory group will be involved in the final decisions about this.
	32				Will take many yrs for quality chalk grassland with present plans	Existing chalk grassland is kept, and new additional areas are created where there is currently arable farming and so there is a net benefit to this habitat. Timescales can be improved through nutrient analysis and cropping of the land where necessary to reduce nutrient levels in a relatively short timescale. There is a condition in place to do nutrient analysis to inform the advisory group.

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	33				No plans that will benefit chalk grassland specialists	Existing chalk grassland is kept, and new additional areas are created where there is currently arable farming and so there is a net benefit to this habitat. If the management and seed mixes are appropriate then this should show an improvement
6	34	Consultation	Conservation Organisation		Balance needed between open habitat and woodland and limited to no more than option A	
	35			2.7.1-2	Justification less relevant as Surrey is wooded and priority is decline in semi natural open habitats	
	36			2.7.3	Welcome public engagement with natural world	
	37			2.8.5	Brown hare is locally extinct	As it is extinct, the proposals will have no negative impact.
	38			4.5	Appraisal of existing woodland omitted	
	39				Location and extent of arable plant zones misses an opportunity to maximise effectiveness. North 30% of field J Downs Field East and field M should be arable plant zones.	Field letters aren't on the maps in the ES so it is unclear where this refers to

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	40			Table 15	Challenges the spp list	Table 15 refers to significant spp whereas the invertebrate survey refers to rare and notable spp. but it would seem reasonable to expect the 2 lists to match. It is a very much shorter list than in the appendix and perhaps downplays the invertebrate assemblage on the site. 57 are recorded in the invert report yet only 4 are noted in Table 15 in the ES
7	41	Consultation	Private individual		Has cancelled WT membership because of proposal	WT are aware
	42				Welcomes purchase by conservation body	
	43				Trees will do irreparable damage to landscape and open habitats	A general statement of opinion but not supported with evidence or argument
	44				Even aged planting and poor diversity, contrary to WT aims of woodland appropriate to the site that will improve biodiversity	Agreed. Condition for a management plan should mitigate.
	45				Planting wildflower mixes is inappropriate	Advisory group should ensure this is considered.
	46				Questions WT ability to manage a large site	The site is similar in size to others within their ownership
	47				Appreciates open access policy	

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	48				More appropriate to manage as a farm and the sort of landscape found in WW1 period ref Cornfield painting and also contribute to UK food production	This primarily relates to land use and how it connects with WW1 rather than making any point about the impact of the planting
8	49	Consultation	Private individual		Objects to gardening on a grand scale and loss of food production. Increases pollution in the need to find food from further afield.	In the short term there is a loss of production as WT choose not to farm the land. However most of the production was grain which will have travelled further afield than local markets so any increase in food miles is difficult to assess and will be marginal. The reduction in chemical use is a positive impact in that provided the right trees are planted according to the soil surveys, chemical input will be very limited and no fertilisers will be needed.
	50				Planting will spoil agricultural heritage	
	51				Woods cleared in iron age so why recreate this	The aims are broader than replacing woodlands and include space for people to enjoy, and linking and buffering existing woodland. Landscapes change as do farming practices and the landscape assessments will result in a landscape that keeps an open feel.

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	52				Locals would applaud WT if they didn't think every piece of land they buy is suitable for planting	The fact that WT have taken on board the non woodland interest of the site indicates that they have understood the need to keep large areas as non woodland
	53				Has left WT membership lapse as cant agree with the vandalism of downland	WT are aware
	54				Welcome open access policy	
9	55	Consultation	Public body		Only scenario A was presented at public consultation so only A is valid in the ES	The public event was the scoping meeting not a consultation and the ES developed within the scope of points raised so A and B as well as C and D, which weren't part of the scoping meeting either are valid.
	56				HLS agreement in the ES is not the one held by WT	A point of fact but which doesn't have any influence on the proposal. Any current land management support is likely to become unviable or need significant change so other than the statistics of what area is supported currently as habitat this doesn't seem to have any influence on the significance of the proposal.
	57				No std field nos or names makes it difficult to assess areas affected by tree planting.	Agreed, the presentation has made it more difficult to interpret the maps. The map associated with the decision and a layered pdf map has mad this clearer in making the deicison.

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	58				No map showing planting and arable flora together	Map 12 and 13 shows this but the importance of the plants is missing making it hard to interpret
	59				Scenario B has a significant and irreversible negative impact on current areas of interest of flora and fauna	Scenario B hasn't been consented
	60				The avenue wasn't in consultations and goes through arable habitat on map 15 no landscape impact assessment	Agreed. The lime avenue has been removed.
	61				Little evidence to support assumption that arable plant zones would support that the inner part could support arable plants. No soil analysis of nutrients, no cultivation followed by fallow (as opposed to cropping) to monitor likelihood of success.	This does need to be considered and monitored. It does appear that the area of field margin being managed appears to reduce, but if the margins of the arable plant zones are included then the figure increases, so while the ability of the field centre to colonize is unknown, it is an opportunity to improve on the current situation.
	62				Cpt 12 impacts on a known population of a vulnerable sp. and result in local extinction	There is an impact, and the cpt is planted and not monitored. There are other margins where the same flower occurs so extinction seems unlikely. However a revised plan will result in most of cpt 12 being left unplanted.

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	63				Establishment of a sward in arable zones is inappropriate for arable flora. So a crop at low density. Benefits birds and reduces nutrients	Plantlife recommend a crop to reduce nutrient. A condition to address this has been included.
	64				Continued management of arable margins where s41 spp recorded along with 50m wide cultivated margin	
	65				Retain small cultivated area in S chalk grassland, no planting mix mentioned.	Some of the plants recorded do seem to be arable flora and so a cultivated margin seems appropriate although the advisory group and management plan will confirm or otherwise.
	66				Wildflower grass mix. Includes corn poppy which wont survive, suggest birds foot trefoil lower rate of fescues with advice from SBS or Plantlife	Suggest this is accommodated on advice of advisory group
	67				Removing 40ha of overwinter stubble, all wild bird seed mixes and arable cropping hasn't been assessed	Condition of cropping fields where nutrient levels are high as agreed with an advisory group will give the opportunity for overwinter stubble

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	68				Scenario A will have less negative impact, Scenario D will have no negative impact on arable flora or fauna, Avenue planting has a negative impact on flora but no reference to this	Avenue of limes has been removed. Scenario A is given consent with conditions that have the potential to have a positive impact
	69				Clear management and monitoring plan for arable species should be secured if planting is allowed	Management plans and monitoring are conditions of the consent
	70				Current ES scheme will not be viable at 40% or above tree planting.	This is a matter between NE and WT
10	71	Consultation	Public body		Not sterile farmland but land of high importance for arable flora and fauna	Accepted
	72				Despite evidence of the importance of open habitat and species the proposal is heavily planted even under scenario A.	Scenario A has been modified and the option to plant monitored areas will need a further EIA opinion. The condition of management plans and an advisory group will provide a degree of certainty around the continuing importance of the open habitats and provide the potential for improvement and not just keeping the status quo.
	73				Location of planting doesn't appear to be based on the specialist reports	The planting under the lower planting scenario A has been further changed to further accommodate known flora and fauna

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	74				Revise tree planting areas to exclude majority of arable plant margins	The arable plant margins where there are known records of rarities are kept free of planting.
	75				How will genetic and provenance diversity be achieved can UK nurseries supply and is biosecurity considered.	Resilience is achieved through a broad range of tree species. Further advice on choosing provenance and origin of tree seed is available from the FC. Any planting stock would have to comply with current Forest Reproductive Material regulations
	76				Ironic that the most potent symbol of WW1 is the poppy a plant of open disturbed habitat	
11	77	Consultation	Private individual		Lapwing, since WT informed about birds filed ploughed and nests destroyed and ES downplays their importance contrary to claims on WT website.	Ground nesting birds are considered in the ES and advice that alternative areas suitable but perhaps less optimal are available within the site. Also the change to conservation management can be better in terms of the effect of operations than the current.
	78				Lapwing, reliance on availability of off site nesting sites	
	79				Later visit recommended by Dr Ken Smith to check for lapwing didn't take place. Correspondent visited in May and several birds seen nesting and most probably with young	This is noted and the assumption has been that they are present.

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	80				Downs field recognised as important for breeding lapwing but will be lost in scenario A and B and best breeding area sacrificed in vain hope they will nest elsewhere but other site less suitable	See 77
	81				Planting will have detrimental impact on skylark with 19 territories lost rapidly with 4 more lost in time. No Home field was skylark territory but none after tree planting.	The planting plan has been altered to accommodate skylark more completely. There is a loss of recorded territories but expert advice is that the proposed open space management will be better in terms of breeding success.
	82				Even aged woodland with little ecological value for a very long time.	The woodland management plan will include new woodland, and that, along with management of existing woodland and the use of natural regeneration in areas gives the opportunity to improve the age structure of woodland.
	83				Surrey conservation orgs trying to push back trees on valuable habitats	An observation rather than an impact of the project.

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	84				Existing hedges important for inverts and report warns that shading will result in loss of many nationally scarce spp. present and 5.5km are lost	The importance of invertebrates and hedges is considered by the inclusion of a condition to map where the important hedges are and to keep them open if they are within a tree planting area. There is additionally a condition that planting plans will be produced for FC approval prior to any planting.
	85				Vague mentions of grazing and mechanical scrub removal for Back o Pips field but proper management plan not available until 2017. Open part of No Home field predominantly red campion which isnt an open habitat plant	Management of open habitats will be subject to a management plan and involvement of an advisory group.
	86				17 arable fields of SNCI quality and together of national importance for arable plants, but already reports of herbicide being sprayed on areas noted for arable plants in 2016.	The ES recognises the importance of arable plants and the conditions attached to the decision will further concentrate effort towards their conservation.
12	87	Consultation	Conservation Organisation		Planting of scrub around Round Wood East field ill advised as it supports a range of notable plants. Even greater erosion of margins under scenario B	Only the western edge is planted and the plant records show that the other boundaries away from the woodland are where the plants have been found.

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15	88		FC	Appendix 33 – Stakeholders	Specialist group table. Does not include Plantlife, Butterfly conservation, Bat group, etc. Table says things like ‘very supportive of the project and very warm response etc’ unsubstantiated and objective opinions and no detail provided on which scenario of the project they were commenting on A or B?	Background information
	89			Map 1	What does the red line denote – two areas around Kingswood with red boundary – are these part of the project?	
	90			2.8	The details provided are all on the basis of Scenario A however WT are seeking approval on a larger project (scenario B) This will not fully reflect the environmental impact of the preferred scenario.	The decision is based on scenario A, without the option to plant monitored areas after 5 yrs which would need a further request for an opinion under EIA regs.

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					<p>The planting map page 25 does not include the areas of planting for the regiment of trees, orchard, lime avenue or cherry avenue that can be seen on Map 6 page 31. The avenue of limes was not on the proposal map sent to the scoping meeting – appendix 1 so consultations at this stage would not have considered its impact – landscape and also ecology. It runs through an arable plant zone which is likely to affect the ecology of some of this area (see map 22 page 92)</p>	<p>The lime avenue has been removed and the position of the cherry avenue is subject to a condition.</p>
					<p>The proposal and planting schedule provide no information about open space. Cpt 17 and 18/19 are large blocks (18.46ha and 16 ha respectively). Open space will enhance ecology.</p>	<p>A condition requires a planting plan to be produced and agreed with the FC prior to planting each year.</p>
					<p>No details of planting scheme – rows, random, blocks, mixed species etc. Page 26 simply says it will be varied (over what scale and what principal).</p>	<p>See above</p>

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					Have the trust considered Climate Change and suitability of chosen species. Beech is in high percentage – but likely to suffer under climate change especially on chalky terrain	This will be raised with WT and there is advice available.
	91			2.8.2	Page 28 specifies all areas will be tilled and rolled. What is the implication of this method for the propagation of invasive weeds? Why has this method been determined. Also what is the ecological justification for the wildflower seed mix chosen. Giles Groome’s report states ‘Any proposals to plant up new woodlands with ‘wildflowers’ would be significantly negative for all habitats other than improved grassland’ page 3 of his report in appendix 8.	The management of open habitats will be agreed with an advisory panel and a management plan will be a condition of the consent.

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	92			p30-32	These do not appear on the map – unclear where they are and what they are. Jutland wood is part of the grove area – not clear how it is distinct or relates to the grove – planting plan required. Avenues of trees – planted ‘where possible to do so’ – consider overhead cables – what are the constraints	Lime avenue removed. Detailed planting plans will be needed.
	93			2.8.5 mammal control	Has any proposed fencing take into account badgers movements as per the badger report (appendix 4 page 5)	Badger gates are a condition of the consent
	94			2.8.6	‘Active management of existing woods will contribute to age diversity’ What is this management – detailed where?	A woodland management plan for existing and new woodlands is a condition of consent
	95			2.8.7	Which method of the two proposed will be used and where – when will chemicals be used as opposed to mowing – why and what is the ecological impact likely to be.	Details of threats and response will be needed in a management plan which is a condition of the consent
	96			2.8.8	This is not a long term strategy. Will there be beating up? How will the woods be managed in perpetuity – objective for long term management – timber? Biodiversity? Management plan?	The management plan will need to address objectives and strategy.

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	97			2.9	Open Habitat – not enough detail re cultivation and grazing to judge impact	The advisory group will help ensure the necessary detail and advice is available.
	98			2.9	This section is based around Arable plant zones but it is not clear how these have been determined – which species and distributions have been used.	
	99			2.9 arable plant zones	This section says a crop will not be planted but Plantlife recommend that a crop should be planted – see section 3.7 page 5 appendix 10. What is the justification?	Condition that crops will be used in field centres where nutrient levels indicate this would be an advantage
	100			2.9.4	Mentions table 6 but this should be Table 7	
	101			2.10 other habitats	No mention of existing woodland. Preservation and management of this will have direct impact on success of the planting project.	A woodland management plan for existing and new woodlands is a condition of consent
	102			p 40 Paths map	Is there a reason why the Bridleways are not shown as per map 2 page 18?	The maps is showing permissive routes and not rights of way.

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	103			p43 Impact Table	<p>The assertions made about the various impacts in this table are wholly unsubstantiated and in cases I believe biased and subjective. See Flora and Fauna – grass paths – what will the floral benefits be? See Soils and water – no impact from grazing? Have they considered nutrient loading/poaching etc and determined suitable numbers to avoid this. See Flora and Fauna – Mammal damage control – what about impacts on badger routes when fencing is put up etc. Very limited scope of assessment in this section with no cross referencing to justify their impact standpoint.</p>	<p>Not all the impact assessments are accepted and a series of conditions are put in to ensure that where there is an opportunity to have a positive impact it is realised.</p>
	104			p45-48 scenarios	<p>Which scheme has been presented to consultees. Is 5 years between A and implementation of B enough time to assess impacts and if so why?</p>	<p>The consent relates to A as the multiple impacts of B were felt to be significant.</p>

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	105			p52	The extracts used here exclude local authorities priorities to also have sustainable local industry and resource management. WT could manage woods for woodfuel and adhere to these policy aspects too which can be found in the respective policy docs.	
	106			p69	This section makes no comment on the ecological value of the hedges on site apart from their invertebrates. Makes it hard to know what the loss will be when half of them get integrated into woodland edges and whether the planting of new hedges is actually a net gain.	The impact of hedges being overgrown by woodland and the consequential impact on invertebrates is noted and conditions around mapping the location of invertebrate records and using shrubs and open space within woodland planting to keep them open is a condition of the consent.
	107			p75-80	Para 5 page 75 – field margins will be monitored (see also page 78-80) – to determine if more woodland is planted or not. Is monitoring period suitable – page 80 2-3 years for night flowering catchfly etc? Associated Map 17 is not clear (how does it relate to map 18) and no key.	The monitoring is a condition of consent but any further planting will need another EIA opinion request.

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	108			p82	4,500 m of hedgerows will become woodland edge. ES specifies this is not loss of hedgerow habitat. I disagree – woodland edge is different habitat to hedgerow and is used by different species. It also requires different management and will be altered by the growth of the surrounding trees.	See 106 above
	109			p84-85	Maps Need keys	This would have made the document more user friendly
	110			p87	Permanent fencing of open areas – what type of fencing? What does locked gates mean? - If no access through these areas March – July need to see alternative paths map as the fenced area is massive (map21 page 88)	This detail should be part of the management plan and the advisory group will help ensure the necessary detail and advice is available.
	111			p90	Implications of fencing for badgers?	Badger gates are a condition of the consent
	112			p99	Should they consider the impact of new path network, compaction and run off? Also will cultivation techniques have any impact	It is unlikely that run off will be altered beyond that of arable farming on slopes. The numbers of visitors without car park and visitor centre isn't predicted to be more than 10000 a year.

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	113			p103	Access maps throughout the report are confusing – see also maps on page 18, 25, 40 and 105 – all different. Some maps need keys	
	114			p107	Project does not envisage an increase in visitor numbers. Really? Even if so people will be much more herded so litter is more likely on route ways? What action will be taken to clear it away – very vague	With no facilities or car park visitor numbers aren't likely to increase to beyond 10000. Generally although there can be litter it isn't to the extent that it becomes a problem. The management plans can include this as part of the strategy.
	115			p112-113	One hedgerow appears to be in conflict with the proposed Lime Avenue. Also in Scenario B map many hedges marked as wood edge habitat now fall within an area of planting – unclear what is happening here.	Lime avenue has been removed and option B hasn't been consented

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	116			p132-149	Is this not an appendix? It is extremely subjective and full of bias. Statements like the proposal represents a “best achievable outcome” (page 132) cannot be substantiated. Similarly ‘...the amount of woodland creation...will have a beneficial and restorative effect upon the landscape....’ What does this mean? And presumably not if you prefer or require rolling fields or arable output. This whole report is full of comments like this which are vague and biased. It also refers repeatedly to ‘horsey-culture’ (136) in pejorative terms etc. I would suggest this is not an impartial report.	Landscape and how individuals regard it and changes to it is variable and subjective. Generally the open landscape is appreciated and option A will have much less impact
					Does not consider the effects of the permanent fencing around open areas	Fencing is widely practiced in farming. The extent of fencing around agricultural areas may need consideration under agricultural EIA regs.
					Only considers effects of lime avenue in terms of the main viewpoints but not whether it is appropriate to this landscape and the impact on the ground.	Lime avenue has been removed
14	117	consultation	Private Individual		General statement that only allowing 28 days for the consultation is scandalous	This is the normal period for consultation.

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	118				Claim that planting trees in inappropriate locations to increase peoples understanding of natural habitats is wishful thinking	
	119				Neither scenario can do anything other than cause considerable damage to an area of huge importance for wildlife	While it is difficult to see how option B can be accommodated without having a negative impact, option A manages to keep many of the features that are appreciated and presents the opportunity to improve the biodiversity of the area, which the no change scenario couldnt.
	120				Lack of time and that detailed plans for any of the proposals will not be available until 2017 suggests that any decision based on the EIA could be flawed and subject to legal challenge.	The 28 day consultation is as laid down in the regulation. We cannot give our decision within the 28 days. The conditions mean that management plans for the woodland areas and open habitat will be developed within 12 months, and that an advisory group will help develop the open habitat plan, and also no tree planting can proceed until a planting plan is agreed by the FC
13	121	consultation	Conservation Organisation		WT aware of the SSCI status and plant interest and HLS prior to purchase	
	122				Welcome increase in area of land for arable plants and chalk grassland	It is felt that with good management the project will deliver a better overall result than is the case at present

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	123				No baseline for the EIA established	It is felt that sufficient base line data covering numerous aspects has been presented and there will be continued monitoring.
	124				Specialist consultants not known	
	125			p57	Only Giles Groome has recorded on the site	
	126				No mention or recognition of SBS data from 1984 to 2014	
	127				Concerned about monitoring APZ for 5 years only	Although there will be a condition to monitor, any further tree planting would need an EIA opinion
	128				Quoted area available for arable plants is wrong	There are some discrepancies in areas, and interpretation of areas, but under scenario A, the area available as arable plant zones is an increase from that currently available.
	129				No apparent consultation with informed local and National bodies such as SWT and NE in preparing the ES	There has been involvement with NE and a wide range of bodies were consulted.
	130				Ignores evidence of where some fields of importance occur	The planting plan for option A has been further modified to keep some important areas open.
	131				Inadequate monitoring of arable areas	The conditions require that monitoring will include work by a specialist and not rely on volunteers

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	132				No mention of translocation of spp as mitigation	This has been considered and could be an area for consideration by the advisory group.
	133				WT seem to think arable plants will just appear of their own accord	
	134				Spp for chalk grass unsuitable	The seed mix will need to be agreed in the management plan and by the advisory group.
	135				No briophyte survey	This wasn't raised during the scoping exercise.
	136				Unhappy with extent of tree cover in Surrey. No acknowledgement of present extent in Surrey	
	137				Tree spp not similar to that on site and elsewhere in Surrey	The range is broader than perhaps is represented in the woods on site, but a range of species while not entirely representative of the immediate locality, is suitable for the soil types and the range means the woodland will be more resilient.
	138				No acknowledgement that woodland to establish ground flora takes a long time	The ES doesn't make any claims about the speed at which ground flora will establish and so there is nothing misleading in this.

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	139				Current flora exists because of traditional farming in a landscape familiar to those returning from WW1	The interest is almost entirely restricted to the margins of arable fields, where current farming practices have restricted it through current crop sowing timings, density and use of inputs. With some cropping of the fields to be retained as APZ's the landscape will remain familiar with a gradual change away from arable farming.
	140				Fails to recognise existing assemblage of arable shaw and woodland	
	141				Concern over the removal of a large area of productive land for food	
	142				Effect of visitors being minimal is unlikely	The change to high numbers of visitors is only predicted to happen if planning permission for visitor facilities is granted. Current numbers will be low and over a large site with management of access during key periods, the effect is thought to be minimal.

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	143				<p>Welcome purchase by conservation org, but would prefer they respect the characteristics of the site, and could be a great opportunity to conserve the farm out of respect for soldiers and others of WW1</p>	
16	144	consultation	Conservation Organisation		<p>Concerned that the open habitat and rare arable plant spp are still not being given due consideration despite evidence and so unable to continue to give unequivocal support</p>	<p>The main emphasis of the ES does address the relevant interests of the site, and additional conditions will ensure that the management needed to conserve and enhance those features will be a condition of consent, which will also be at the lower level of planting.</p>

Map1 Approved Project Map

