

EIA Opinion for Initial Afforestation at Valander Land, Vale of Evesham.

Summary of Reasons

1 Purpose

This document is a summary of the reasons for the Forestry Commission's Opinion that the proposal to create new woodland at Valander Land, Vale of Evesham (Grid Ref: SP131454) does not require our consent under the Environmental Impact Assessment (EIA) regulations that apply to forestry projects.

2 Background

The Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999 (Statutory Instrument: 1999/2228) make the Forestry Commission (FC) the competent authority for assessing forestry projects. These are:

- **Initial afforestation:** creating new woods and forests by planting trees (on an area that has not had trees for many years). This category includes using direct seeding or natural regeneration, planting Christmas trees and short rotation coppice.
- **Deforestation:** removal of woodland to convert the land to another type of land use (e.g., heathland, farming).
- **Forest roads:** constructing forestry roads, including those within a forest and those leading to a forest.
- **Forest quarries:** quarrying to obtain material (rock, sand and gravel) for the formation, alteration or maintenance of forest roads.

FC must give an Opinion on whether such projects will have a significant impact on the environment. If the proposals will have a significant impact(s) they require FC's consent which may or may not be given following a thorough and objective assessment of the identified significant impacts. In order to reach an Opinion, FC "screen" the proposals to assess their impacts and whether they might be considered significant.

The regulations provide thresholds to help guide when a project may have a significant impact(s). However, scale is not a single determining factor and the screening process must consider all of the proposals impacts and whether they are significant on a site-by-site basis. The screening process does not consider alternatives to the proposals or alternative sites but considers proposals objectively to assess their impacts for significance.

Our current guidance on the EIA process can be found on our webpage:

<http://www.forestry.gov.uk/forestry/inf-d-6dfkbc>. The EIA Regulations can be viewed on the web site for UK legislation: <http://www.hms.gov.uk/si/si1999/19992228.htm>.

3 The Proposal

In June 2012 Dorsington Farms Ltd applied to FC for grant aid (application reference 29243) under the English Woodland Grant Scheme (EWGS). The proposal was to create an area of semi natural woodland at Baylis Hill and Bushy Hill between Pebworth and Honeybourne on approximately 150 hectares of land, centred at grid reference SP131451. The proposal was subsequently modified to cover a reduced area of 128 hectares.

It was proposed that the planting would be informed by the best practice guide, Managing Ancient and Native Woodland in England and the proposal would consist of mixed native broadleaves including oak, field maple, small leaved lime, aspen, wild cherry, rowan and willows. The shrubs will include hazel, guelder rose, blackthorn, spindle, privet, wayfaring tree and buckthorn.

Tree planting would be at random spacing to achieve an average stocking of no less than 1,600 trees per hectare. The planting design also included up to 40% open ground. The open ground would consist of a network of wide rides on average 12 metres in width but up to a maximum of 20 metres. Other open areas such as glades would be strategically designed to accommodate any necessary views to and from the planting.

It was stated that the overall aim of the proposal was to create woodland to provide multiple benefits, including for biodiversity, landscape, and water quality and to increase the space available for public amenity by creating a network of permissive footpaths.

The tree planting proposal is adjacent to three other recent and previous afforestation projects:

- Pitchells Farm planted in 2002 (Grid Ref:SP139451).
- Blenheim Farm planted in 2004 (Grid Ref:SP117458).
- Baylis Hill planted in 2008 (Grid Ref:SP122455).

Because these were also initial afforestation projects under the EIA Regulations these projects have been considered in the screening so that FC can provide an informed Opinion on whether the current proposal would have significant impacts on the environment when considered collectively with these existing afforestation projects. Additionally, as part of this application and screening, the applicant was asked to provide a Landscape Visual Impact Assessment (LVIA) which provides a consistent and recognised method for assessing the effects of landscape change. The requirements for the LVIA were agreed with interested parties prior to and during its compilation.

4 Impacts

Several impacts were identified through the Screening and consultation process. A record of all the comments and evidence considered by FC in reaching the Opinion are set out in the Issues Log (Appendix A). A summary of the key conclusions is set out in this document.

4.1 Landscape

Due to the concerns of Worcestershire County Council, [+ District & Parishes] that the proposals were not consistent with the local landscape character, the applicant was asked to undertake a LVIA of the proposal. The LVIA was prepared by Stansgate on behalf of the applicant October 2012 and a copy is presented as Appendix C.

The LVIA was reviewed by the FC's Landscape Architect who found it to be an appropriate and competent report, which follows a recognised methodology. The report identifies that from long and middle distance the proposals do not present a significant landscape or visual impact. The report identifies that there are some landscape and visual impacts from a) short distant view and b) views out of the site.

Further information, on survey / background information (landform, visual detractors, views) and the extent to which the landscape character area type is affected by the proposal, was requested by FC (4th February 2013) and provided (21st February 2013) by the applicant. This supplementary information revealed that the extent of landscape character areas (LCAs) affected by the total woodland creation proposals amounted to 0.9% of Village Claylands and 0.63% of Principle Village Farmlands LCAs.

The request for further information also sought a judgement on the quality of the landscape character represented in the two Landscape Character Areas. This was to assess whether the proposal area contained a particularly valuable representation of the features or characteristics valued by the landscape character assessment. This was not addressed directly in the response and was subsequently considered to be an unrealistic request in an area where the landscape had been significantly modified by agricultural practices, (Note 1). However it was clear from looking at the proposal site that there were a number of detractors such as the pylons and the railway line which had quite an impact on the quality of the landscape.

Having received the relevant information the FC Landscape Architect visited the site on 17th April 2013 to make a brief external and internal survey of the site, its setting and surroundings via public roads and rights of way. The conclusions of this survey are presented in Appendix C, which includes recommendations to mitigate the landscape impacts.

We have concluded that while woodland is not historically a characteristic of the Village Claylands and Principal Village Farmlands Landscape Character Areas (LCA) (indeed woodland is considered to dilute the 'distinctive character' of the Principal Village Farmlands LCA), the proposals will not have a significant adverse impact on the landscape.

We have reached this conclusion after considering the findings of the LVIA, the supplementary information, the survey of the site and subsequent comments made by the FC Landscape Architect and revisions to the planting design. The following have been the key factors in our decision:

- Landscape Character Assessment, with its associated guidance and the UK Forestry Standard Landscape Guidelines are guidance to aid landowners with their land-use planning. They are not designed to restrict change that is not significantly negatively adverse. We have concluded this project is not significantly negatively adverse for the reasons below.
- The proposal has the potential to result in a major landscape change around Baylis's Hill (the Village Claylands LCA). To address this, the woodland's design has been revised to incorporate a significant area of open space along the low ridge/public right of way to retain the open character and views over the Vale of Evesham (it is these views that make this location distinctive within the plain). We consider that this measure provides mitigation against any negative consequences of the proposed woodland creation and therefore impact will not be significant.
- The woodland's design has also been revised to incorporate a significant area of open space around neighbouring residencies. We again consider that this measure ensures the impact of the proposed woodland creation will not be significant.
- There are no statutory designations (e.g., an 'area of outstanding natural beauty') or particular defining historic landscape features that are sufficient to justify the permanent absence of woodland from this location, especially when the mitigation provided by the revised planting design is considered.
- This is a large-scale woodland creation scheme; our assessment of significance must consider the number of people affected by the change. With regards to this we have found that the landscape of the project area is accessed mainly by people travelling by car along the country road north of Honeybourne, or by foot, or horseback on the few rights of way, which do not seem to be heavily used. The fact that few people are affected by the proposal leads us to conclude the proposal will not have a significant impact.
- The areas of Bushy Hill and Kites Hill are not obviously visible and are inaccessible and consequently the proposal will have negligible impact on the landscape in these areas.
- The proposal has the potential to affect more people through tree planting on the low ridge (Baylis Hill). We do not believe significant numbers of people will be affected by this and consider that the impacts have been mitigated by the revision of the planting design mentioned earlier.

4.2 Food security

A common concern raised during screening was the impact the proposal – converting grade III arable land to woodland – would have on food security. We recognise food security as important issue and that the removal of this land from agriculture will have an impact but do not consider the impact will be significant when the following points are considered:

- The woodland would remove **128.58** hectares of grade III land from productive agriculture. This locally, regionally or nationally is not a significant area in food production terms and represents 0.1% of the moderate agricultural land within the Severn and Avon Vale. It is the less productive land that will be more suited to woodland conversion if government's aspirations to increase woodland cover are to be realised– (see the [Government's Response to Independent Forest Panel](#) report).
- The creation of woodland is also not an irreversible land use change. It is possible to revert land back to arable production if food production from this land were to be considered by the landowner as more important, and subject to compliance with the regulations and policies that apply at that time.

4.3 Farmland birds and biodiversity

Concerns were raised that the loss of arable land will have a detrimental impact on biodiversity, especially farmland birds. While the proposals will have some impact, we cannot conclude the impact will be significant and that all of the impacts will necessarily be negative.

The site lies within a predominantly arable landscape (see Appendix B) which will continue to provide habitat for farmland wildlife, where the land is managed appropriately. In this context an area of woodland should serve to increase the area's bio-diversity overall. The slow transition of the arable land management into woodland condition will allow for more mobile arable species to migrate the short distance to surrounding favourable arable habitat.

The objectives and 'value for public money' of the existing land management projects have been considered in order to keep some of the key outputs from the Environmental Stewardship Agreement currently in place on parts of the land. With Natural England's input, key areas for farmland birds have been identified and excluded from the tree planting. Some areas have been enhanced through careful design and buffering to provide continued mosaic and connectivity of habitat for the benefit of skylark, corn bunting and grey partridge.

The project provides more opportunity to move or replicate other features such as nectar sources and field margins elsewhere on the project area, for example the open areas, rides and glades, sown with wild flower mixes, should complement those nectar sources in the future.

Another point raised related to the presence of European Protected Species (EPS); these will be protected by regulation regardless of the land use change and operation. It is expected that the creation of new woodland with internal and external edge habitat will only enhance the habitat types this range of species need. Therefore, allowing for appropriate mitigation, there are no significant impacts identified for EPS.

A change of land use to woodland will reduce intensive land management practice and chemical inputs into the land, reduce chemical drift onto the neighbouring headlands and conservation features and the established hedgerows. This is all beneficial for flora,

insects, mammals and birds. The woodland design itself seeks to maximise bio-diversity in several ways:

- Incorporating open, scrub and edge habitats within or adjacent to the woodland to maximise bio-diversity.
- Managed open space to create a diversity of habitats within the woodland.
- The use of a mixture of native tree species to provide diverse woodland more robust to climate change and pests and diseases.
- Worcestershire Wildlife Trust has concluded that the proposal to create native woodland would benefit local bio-diversity on the whole.

In conclusion, when these factors are all considered, we do not believe there will be a significant impact on bio-diversity and in particular, on farmland birds.

4.4 Public access and recreation

There was both support and opposition to the proposal's permissive public access. Concerns were raised over the increase in visitor numbers and potential roadside parking issues, and also the potential requirement for additional access infrastructure. The applicant's intention is to keep access low key and pedestrian by using the existing permitted access routes and a small network of linking permissive routes 'by agreement of the estate'.

In contrast, an ANGSt (Accessible Natural Greenspace Standard) analysis carried out by Worcestershire County Council identifies Wychavon District as having the lowest proportion of accessible natural greenspace at only 3.6% of the District. Even given the sparsely populated nature of the District, households in Wychavon have poor access to sub-regional scale accessible natural greenspace with only 20% of households within 5km of 100ha+ sites and 2% of households within 10km of 500ha+ sites.

The rural nature of the District means that access provision is needed both at a neighbourhood level for communities, as well as providing larger accessibility assets to cater for the populations in the main settlements in the District:

The District has 3 sub-regional assets, which are:

- Evesham Country Park.
- Evesham Battlefield.
- Bredon Hill.

The parish path warden has indicated there is a local demand for public access in the Pebworth and Honeybourne parish.

Opening the site to permissive access, linked to existing designated Public Rights of Way (PRoW) should encourage greater use of the site for low impact recreation. This is a positive impact for accessibility in the District.

A further point considered in the screening is that people do enjoy taking recreation in woodland and may choose to visit the site because of its woodland features. The Annual

Report from the 2011-12 survey to monitor engagement with the natural environment (MENE) (<http://publications.naturalengland.org.uk/file/1755933>) shows that 358 million visits were made to woodland / forest sites (13% of visits) compared to 241 million visits to farmland (9%). This is clear indication that people enjoy walking and recreating in woodland so this proposal has every chance of encouraging visitors rather than discouraging them.

The main concern with access came from the immediate neighbours to the proposal and the positioning of the permissive tracks, particularly those in the eastern part of the proposal to their residence and property. In the original application permissive access was not included in this part of the proposal but was added later. Subsequently, and in view of the feedback from Network Rail and those residents, the applicant removed the permissive access from Bushy Hill and Kites Hill to the east and north of the railway lines.

Permissive access on the Baylis Hill side was redesigned to incorporate feedback and requests from neighbours. The redesign included additional capacity to the existing PRow network and Baylis Hill 2008 and has incorporated alternative routes. This has eased the concerns that were raised by residents in this area.

We have also noted that the woodland's design will provide large proportions of open space (up to 40%) with some areas providing greater visibility so that people can enjoy views.

In light of all these considerations we believe that while creation of the woodland may have an impact on some individual's choice to visit the site, this impact is not significant. Given that the aim is to encourage informal public access to the site, (addressing a shortfall of accessible natural green space) this has been balanced with the Exclusion of permissive access from the proposal where this has caused concern from Network Rail and local residents.

4.5 Historic environment

The information from the Historic Environment Record supplied through consultation with Worcestershire Archive and Archaeological Service does not record any significant heritage assets in the area proposed for woodland creation.

The use of the land for arable farming over its recent history has not revealed any features of archaeological interest and no features or artefacts have been recorded. Cultivation activity associated with arable production has the potential to damage archaeological remains (see for example English Heritage's document: "[Ripping Up History](#)"). The removal of land from cultivation into grassed open space is a benefit and minimal ground preparation in association with tree planting will limit further disturbance.

The applicant is committed to adhering to UK Forestry Standard (UKFS) requirements and its guidelines in relation to historic environment. It is understood that any findings would be reported to HER. Any relevant surveys employed to manage the risk of an impact from tree planting will inform necessary modifications to the woodland design.

In conclusion, because there is no available information to indicate the presence of important archaeological features within the proposed area and given the current arable farming on the land will have a greater impact on any archaeological interest than the proposed woodland, the impact on the historic environment of creating a woodland at this location is not considered to be significant.

4.6 People and job security

Overall the screening led to very few responses relating to this topic that were not directly linked to access. A number of screening responses mentioned that the land use change would directly impact on local jobs, probably positively. It is expected that there would be no net loss in jobs by afforesting the land and in fact there is an argument that the proposal should stimulate jobs within the local economy with the requirement for the woodlands trees and open areas to be managed. Consequently we have concluded the project will not have a significant impact on people and job security.

4.7 Soil and water

The Environment Agency (EA) have prioritised the catchments of all river 'water bodies' in England that they identify as "failing to reach good ecological status due to three or more pressures" for improvement in condition under the Water Framework Directive. The proposal site lies within the EA's zone of 'diffuse pollution and flood risk', and is therefore seen as being affected by at least three pressures. These 'pressures' include sources of diffuse pollution from land management through use of phosphates, nitrates, and pesticides, and from sedimentation.

EA's analysis also included areas of land where the drainage of these pollutants is thought to be responsible for ground water bodies having poor chemical status and a rising trend in pollutant concentrations.

During the screening a number of comments made, with supporting photographic evidence, that illustrated recent flooding problems at Broad Marston and high flows causing periodic flooding in the vicinity of Middle Barn.

Whilst it was discussed that the land could provide opportunities for water management in the form of balancing ponds, it is already recognised that woodlands, with careful design, can also alleviate flood issues by reducing run off and sedimentation in water bodies at peak flows. The trees, when established, will provide increased hydraulic roughness, slowing the flood flow and increasing soil filtration, so increased volumes of water are absorbed into the soil locally.

Also, the removal of intensive agricultural practices achieved by conversion to woodland will help reduce chemical inputs on the land and buffer and intercept run off from other adjacent fields that remain in agriculture.

In terms of soil and water, the creation of woodland will not have a detrimental impact. Instead this project can only be regarded as a positive opportunity in contributing to the

EA's targets for improving ecological status for watercourses and managing localised flood risk.

5 Conclusion

During the process of EIA screening and as a result of feedback from consultation the planting design has undergone number of iterations. These are detailed in the LVIA (Appendix C) and supplementary information. This has meant that the project proposal has been reduced in area from 150 to **128.58 hectares** consisting of a net area of trees and shrubs planting of on **81 hectares**. This is in part due to removing some of the original compartments altogether, but mainly due to increasing the open space elements from around 20% to 40% (the maximum FC consider acceptable when creating new native woodland). This has meant that the woodland mosaic has been kept, but that strategic open ground has also been created or increased in size to facilitate both permissive access and to retain important views to and from the site.

In conclusion, while a project of this scale will certainly have impacts on the environment, from the information available to us we do not believe the proposal will have a significant impact that warrants our consent under the EIA regulations for forestry projects.

Overall, we consider that this proposal will be of benefit to the local environment and residents because:

- The proposal location will have a minimal impact on the landscape so as to not significantly undermine the landscape's predominantly open arable character.
- Careful design and maximising the use of open space means the proposal will not compromise views out from the site's key vantage point, ensuring its impact on landscape is not significant.
- Habitat for farmland birds will be retained and the net area of species rich grassland will be increased and benefiting biodiversity in a wide range of ways.
- Public access to green space will be provided in an area where there is a shortfall by permitting and encouraging access across appropriate parts of the project area.
- Contributing to EA targets for improving ecological status for watercourses and managing localised flood risk.

Forestry Commission England
24th July 2013

Supporting documents

Appendix A – Log of Issues raised at EIA screening, public meeting, residents and public register consultation.

Appendix B – Aerial photo of Valander Land.

Appendix C – Landscape Visual Impact Assessment plus supplementary information and FC landscape impact survey.

Appendix D – Final composite planting design.

Appendix E – Supporting EIA checklists.

Due to their file size these appendices have not be attached to this message. All supporting documents can be viewed on West Midlands Forestry Commission web pages.<http://www.forestry.gov.uk/forestry/infd-7baj6l>