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Helen Marrison  
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29 January 2015

Dear Helen

**Heritage Counts 2014 evaluation survey**

Please find below a number of points that the Ancient Tree Forum (ATF) would like to make in response to the Heritage Counts 2014 evaluation survey.

1. The ATF is concerned that 'Heritage Counts' focuses on the built environment which therefore underplays the contribution of natural heritage provided by Historic Parks and Gardens and ancient woodland (including priority wood pastures and parkland). Furthermore it does not explicitly recognise ancient and other veteran and heritage trees as heritage assets and therefore omits their economic and ecosystem services contribution. This runs counter to government guidance (Ancient woodland and veteran trees: protection, surveys, licences October 2014) which states "*Ancient woodland and veteran or aged trees are an important and **historic** part of the landscape....*"
2. The artificial differentiation between the built heritage and natural heritage in documents like this creates a totally artificial distinction when they add value to each other and cannot be realistically separated. Consequently, natural heritage is often ignored and lacks an adequate champion in government. In the case of ancient trees this is exacerbated because they are not even recognised, designated/listed or recorded by government. They are extremely vulnerable and therefore should be of priority for reporting on their status.
3. As an example, the Ankerwycke Yew at Runnymede is centre stage this year as it was an already prominent and well established feature of the site at the time of the meeting between the Barons and King John where the terms of Magna Carta were agreed. So it was wrong for David Starkey in his TV documentary to say that prior to the erection of the monument at Runnymede there was nothing to mark this exceptionally important and historic site. We anticipate that it will be visited by thousands of British and overseas visitors. The ATF are extremely concerned about the increasing footfall impact on the root system of the yew. Government should be acknowledging

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these assets so that their status can be monitored and best practice management encouraged.

4. It is astounding that the significance of such trees to our national heritage and to tourism are left out of a system of counting heritage value. This could be rectified by producing a register of trees of national importance and then their value to society could be identified and then measured. It is crucial that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such ancient trees recognised as historical, cultural and wildlife monuments and highlighted in plans so they are properly valued in planning decision-making. Where they are at risk and no alternative mechanism for securing their future can be achieved, they should be at least protected by a TPO.
5. We would also like to see Heritage Counts recognise the importance of priority parkland and wood pasture as heritage assets, especially those that are not designated as historic parks and gardens. Although without an inventory, we recognise that annual monitoring may be challenging. However, the Ancient Tree Inventory ([www.ancientreehunt.org.uk](http://www.ancientreehunt.org.uk)) is a source of data, which is continually being added to. Natural England Standing Advice 2014 supports this request:

*“4.2 ... Wood-pastures, even if there is only a thin scatter of trees, can be a distinct form of ancient woodland and may be included on the ancient woodland inventory.*

*4.6 Wood-pastures, often with populations of veteran trees, are typically associated with parks, areas of present or former common, upland grazed woods, and Royal Forests, or may be part of a Registered Parks and Garden. Many have not been included on the Ancient Woodland Inventory because their low tree density meant that they did not register as woodland on the historical maps consulted. **Where ancient wood-pastures are identified they should receive the same consideration as other forms of ancient woodland.**”*

I hope this information is useful to you – please contact us if you have any queries about the points we have raised. Please note too that we would welcome an opportunity to discuss how our concerns can be addressed in future reports.

Yours sincerely

Caroline Davis  
Vice Chair  
Ancient Tree Forum

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