

**THAMES BASIN HEATHS
JOINT STRATEGIC PARTNERSHIP BOARD**

Date: 27 March 2008

Subject: **Draft Interim Strategic Delivery Plan:
Results of Consultation**

Report of: Regional Assembly

Recommendations:

It is recommended that the Joint Strategic Partnership Board use the outcome of the consultation to inform the development of the delivery framework.

Purpose of the Report:

To summarise the key points made by stakeholders in responding to the consultation on the draft ISDP.

I. Background

- 1.1 At the meeting in October 2007 members endorsed the draft ISDP for consultation purposes. The consultation on the draft ISDP closed on 15 February 2008. A summary of the consultation exercise coordinated by the Regional Assembly is included as **Appendix I**.
- 1.2 A consultation event was held in January, to which key stakeholders were invited (including members of the Joint Strategic Partnership Stakeholder Forum). The event was externally facilitated and provided those present with an opportunity to discuss the draft proposals with each other in detail. A summary of the consultation event is included as **Appendix 2**.

2. Overview of consultation responses

- 2.1 A total of 124 responses to the consultation were received; a combination of completed questionnaires and written representations. Further information about the responses received and a summary of the points made is included as **Appendix 3**.
- 2.2 The responses received demonstrated a wide range of views about, and interests in the SPA issue. Many of the responses were broadly supportive of the need for some form of co-ordinated approach to addressing the issues associated with the SPA.
- 2.3 A number of the responses covered ground previously considered as part of the South East Plan Examination in Public. In the interests of moving forward it is recommended that the Board does not consider at length these issues; it is assumed that the recommendations of the Assessor remain the starting point for the delivery framework.
- 2.4 In summary the consultation responses showed that:
 - i) There was general support for the principles of joint working and the need for a consistent approach across the area affected by the SPA designation;
 - ii) Some respondents questioned the general principles underpinning the draft ISDP and principle of 3-prong approach; there were some concerns about legality and proportionality of draft ISDP; and some questions in respect of the evidence base behind the ISDP;
 - iii) There was general support for the principles of SANG and access management (although some concerns about the evidence base for SANG), but varied views about the extent to which habitat management should be included in the draft ISDP;
 - iv) There were some concerns expressed about the suggestion that the Board should identify SANG provision at a strategic level, the establishment of a centralised team to deliver access management measures, and the suggestion that the Board should take the lead in determining the scale of the tariff, its collection and allocation.

- 2.5 Overall there was a general view that the delivery framework needs to be simpler and more flexible, with many respondents looking for clarity as to the status of the draft ISDP, the timescale over which it operates and the delivery mechanisms needed to implement it.

3 Conclusion

- 3.1 Given the context of the recommendations provided by the report of the Assessor and the South East Plan EiP Panel, a delivery framework that is based on a three pronged approach to avoiding the impact of new development on the SPA remains robust and appropriate.
- 3.2 However it is clear that the draft ISDP in its current form is overly complicated. In seeking to ensure a consistent approach is applied by Local Planning Authorities in addressing the issue the draft ISDP fails to reflect the fact that that consistency should not preclude flexibility at the local level to take into account specific local circumstances.
- 3.3 In terms of aspects of the draft ISDP requiring further work, it is clear from the consultation that the key issues are:
- i) developing the mechanisms for delivering the investment in SANGS;
 - ii) developing clarity on the key monitoring metrics that are required at the strategic level;
 - iii) developing clarity on the principles that will be applied in considering access management measures.
- 3.4 The proposed way forward for the delivery framework is set out in the following paper on the agenda for this meeting.

Cath Rose
Regional Planner
18 March 2008

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Summary of draft ISDP consultation undertaken on behalf of the Board by the Assembly

1. Tier 1 consultees - In total nearly 400 hard copies of the draft ISDP were sent out to members of the Regional Assembly, RA Executive Committee and Regional Planning Committee, members of the Joint Strategic Partnership Board, members of the Stakeholder Forum, affected LA planning authorities, parish councils within and bordering affected area, SPA landowners, local access forums, and local libraries as requested by local authority officers.
2. Tier 2 consultees – In addition to the Tier 1 consultation, nearly 400 letters and emails notifying other stakeholders about the consultation and providing a web link to the documents were sent out, to other local contacts as requested by individual LPAs, including residents associations, local interest groups and societies, and all SE local authority Chief Executives, Heads of Planning and countryside officers
3. The JSP Board HBF representative disseminated details of the draft ISDP to HBF members and developers within the affected area, and the consultation was promoted by local authorities through a variety of means.
4. A key stakeholder consultation event was held on 17 January 2008, and was attended by local authority planning and countryside officers, major SPA landowners, nature conservation organisations, developer representatives and representatives for SPA users and local interest groups.

**Thames Basin Heaths ISDP Consultation Event
17 January 2008, Innovation Centre Reading**

Summary of Workshop

I. Workstations Exercise

- I.1 Delegates were invited to post comments on a number of key ISDP principles and other issues. The workstations covered:
- Principle of SANG sites to mitigate development pressures, and SANG standards
 - SANG sites jointly designated in a strategic pool
 - Provision of access management support team and resources.
 - Simple tariff structure, standard across whole area
 - Money from development tariff pooled/allocated by joint body
 - Partnership working
 - Making this work
 - Different / better options
 - Evidence Base
 - Anything Else – burning issues, ‘don’t forget’ etc...
- I.2 Key themes that emerged from the workstations were:
- Clarification about the evidence base for visitor pressure, some of the SANG standards, and the success of SANGs
 - The need for further detail about sensitive areas and assessing capacity and discounting
 - The need for large accessible attractor SANGs
 - General support for a strategic resource for access management, but concern that this should be in the form of funding for existing landowners/management projects rather than a separate team
 - Concern over the definition of in perpetuity as 80 years
 - Questions over the fairness and viability of a standard pooled tariff
 - Questions over the size of development to which tariffs /SANGs should be applied
 - The fact that the Board would need greater powers to deliver the ISDP and suggestion that stakeholders should have voting rights
 - The need for monitoring
 - Some support for joint working and a strategic approach, but some views that joint working and a strategic approach was not appropriate
 - The need for local flexibility.
- I.3 Some things that could stop the ISDP working were identified as the legality of proposals (of the ISDP itself, of the principle of a strategic SANG network and a standard pooled tariff, and of proposals for a Joint Strategic Partnership Board with greater powers), a lack of funding, and a lack of joint working. To make the ISDP work, suggestions included the need to build ISDP into

development plan, the need for local variation within a strategic approach and further clarity in certain areas.

- 1.4 Some different / better options identified were the use of 'harder' access management measures, the use of developer funds for mitigation on the SPA rather than for SANG provision, and the use of new green space rather than existing public recreation land.

2. Key Issues

- 2.1 Following the workstations exercise and presentation by Ian Phillips (available on the Regional Assembly website (www.southeast-ra.gov.uk), delegates were asked to identify 2 or 3 things that were key issues for them. In summary, these covered:

- A need to incorporate the ISDP into the Development Plan (RSS/LDDs)
- A need for local flexibility within a clear, simple strategic framework
- Further work needed on tariff details and delivery mechanisms to ensure fairness and adequate funds and contingency
- The legality of the ISDP and possible need for an appropriate assessment
- Access management resourcing and need to work up further detail about access management with landowners
- A need for further work looking at SANG capacity, and identifying SANG network
- How to define 'in perpetuity'
- A need for community involvement
- The legality and powers of the Joint Strategic Partnership Board.

3. Electronic Voting

- 3.1 An electronic voting exercise was undertaken to get a feel for the group's views on particular aspects of the ISDP. The results are included as **Annex I**.

4. Group work and recommendations

- 4.1 From the workstations and key issues exercise delegates were asked to identify an issue, a key message and a next step. These are summarised below.

Issue: Is a standard tariff appropriate? How does the tariff relate to larger development that brings own SANGs? Is the ISDP / strategic approach legally robust? Is there a need for an appropriate assessment of the ISDP?

Key message: Money must be ring fenced.

Next step: Take legal advice on proposals.

Issue: How should 'in perpetuity' be defined? In the draft ISDP a replacement dwelling in 80 years time does not require a further tariff.

Key message: 80 years is not long enough.

Next step: Start with a calculation of costs involved in long-term payments.

Issue: SANGs must be relevant to the SPA they mitigate. Is there a legal need for the

	tariff to be spent on SANGs close to development?
<u>Key message:</u>	Data is currently poor.
<u>Next step:</u>	Collect better data on bird numbers and visitors; allow developer contributions on habitat improvement/management.
<u>Issue:</u>	Does new housing mean a gross increase in population? Does it mean an increase in SPA use? Is the reliance on SANGs, especially existing public open space, appropriate?
<u>Key message:</u>	Disproportionate reliance on SANGs.
<u>Next step:</u>	Consider a more flexible, pragmatic approach in ISDP.
<u>Issue:</u>	Access management principles need reworking. Resource should augment existing staff structures.
<u>Key message:</u>	This will not preclude partnership/cross border working. The Dorset model cannot be replicated across the TBH SPA.
<u>Next step:</u>	Consider mechanisms for funding/resourcing existing structures and programmes/partnerships.
<u>Issue:</u>	Alternative vision for Joint Strategic Board.
<u>Key message:</u>	To include SANG deficit / shortfall, access and education support team, monitoring and review. Money to JSB – to deliver strategic measures – collected as a top slice added to LA tariff (ie delivering SANGs within local authorities).
<u>Next step:</u>	Cost up filling SANGs gaps, cost up access / education support team (building on existing partnerships), cost up monitoring work needed.

5. 'What struck me' and key messages

- 5.1 To round up the event, those present were asked to highlight the one thing that had most struck them throughout the event, and one key message that they would like considered.

What struck me

- 5.2 Many people were struck that there still seemed to be a long way to go, and a do to work up ideas fully. Comments were also made about the complexity of the issue and difficulty in resolving it, the number of different models that need to be looked at and the need for a long-term plan.
- 5.3 Some people were struck by the differences of opinion expressed, but others noted that there was common ground between different interest groups. Similarly some felt other people were being obstructive and negative or were struck by the apparent resistance to joint working and strategic thinking by local authorities, whereas others felt that there was a positive attitude or an overall willingness to take action and make the ISDP work.
- 5.4 A number of people highlighted particular technical points – for example the links between population, housing and pressure on the SPA, the role of access management, the timeframe for and costs of SANGs.

Key messages

5.5 A wide variety of key messages were recorded. Some of these related to proposals within the ISDP, others to the principle, and delivery, of the ISDP:

5.6 Policy principles:

Access management: The need to recognise and/or build on existing structures and talk to landowners and managers; the need to revisit access management proposals and evolve resources to the local level.

SANGS: The need for additional SANGS to reduce current visitor pressure; the need for SANGS to be genuinely new public access land; the need to look at links between housing numbers and population.

In-perpetuity: 80 years is too long; the need to explore the costs beyond 80 years.

5.7 Principle of ISDP and delivery

Simplicity/robustness: The need for simplicity (although also the need for further detail); the need for strategic solutions to strategic issues; the need for robustness and for hard evidence; the need to ensure that the outcome will be legally sound.

ISDP ownership: The need to clarify legal responsibilities; the need for SPDs to support ISDP.

Stakeholders: The need for wider representation from development industry and building industry; the need for greater consideration of the needs of developers.

Urgency: The need for urgency in delivering SANGs, and in monitoring; impractical ideas will delay a solution.

Implementation: The need for the strategy to be implementable; the need for joint working and consistency between LPAs; the need for flexibility and the need to find common ground; the need for a carrot and stick approach including more central govt involvement.

6. Further details

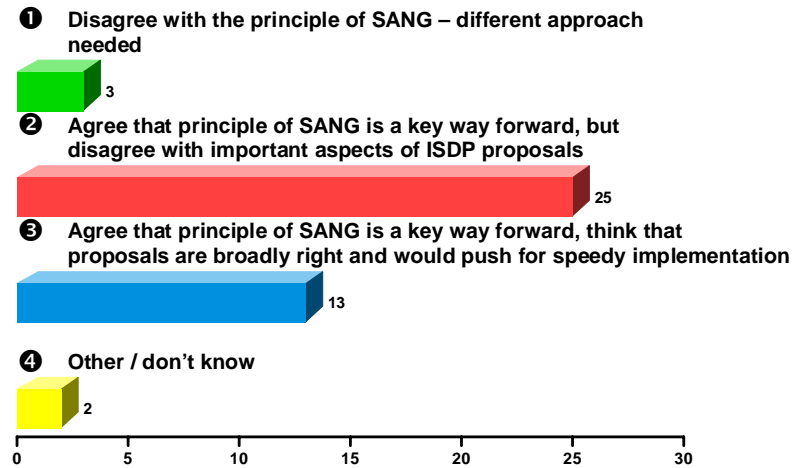
6.1 A full transcript of workstations, key issues exercise, group work and recommendations and 'what struck me' and key messages is available from the Regional Assembly on request.

6.2 The outcomes of the workshop will be fed into the analysis of ISDP consultation responses received by 15 February 2008 and reported to the Joint Strategic Partnership Board on 27 March 2008.

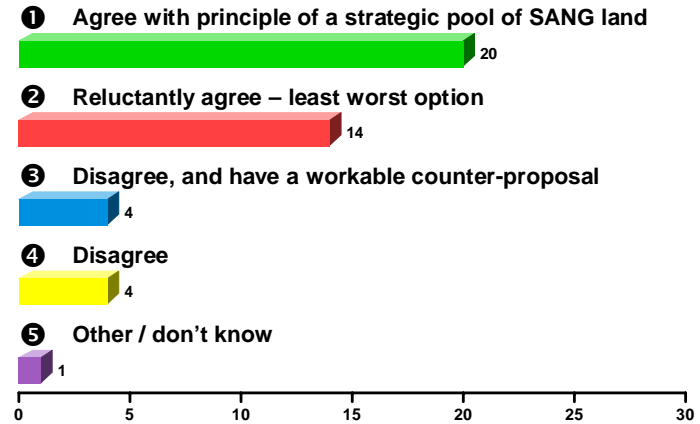
6.3 Please contact Cath Rose at catherinerose@southeast-ra.gov.uk or on 01483 555235 for more information.

Electronic Voting Results

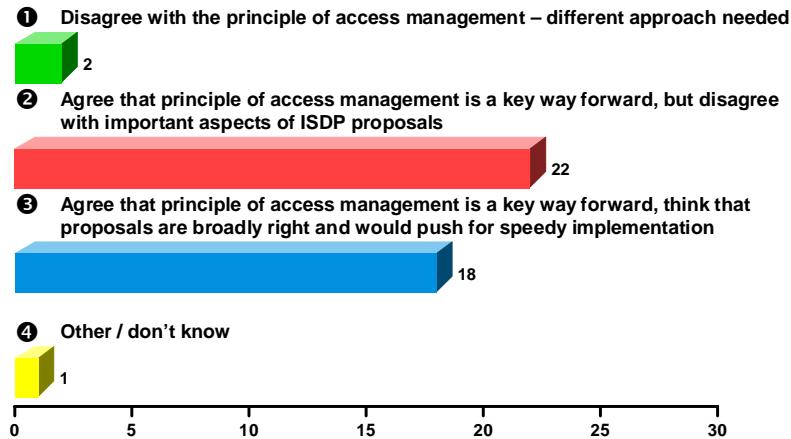
1. The principle of creating or developing alternative greenspace to mitigate development – as one part of a three prong approach - is the right way forward



2. A strategic pool of SANG land should be jointly designated

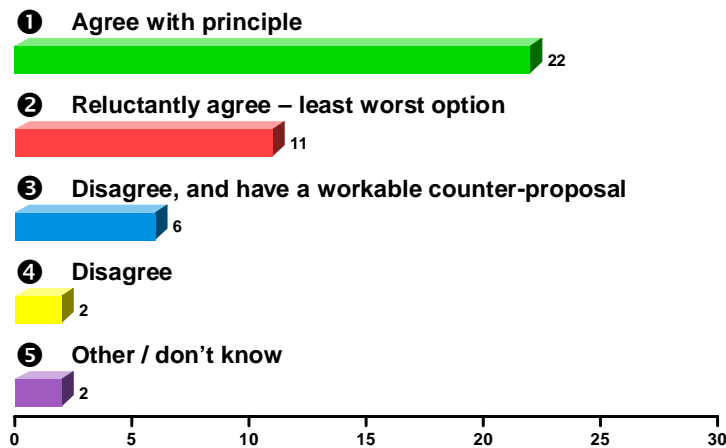


3. The principle of managing access to the heaths through wardening and education – as one part of a three prong approach – is the right way forward

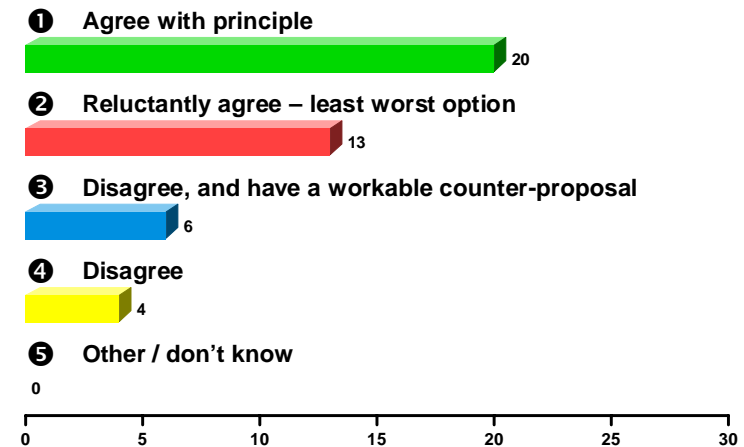
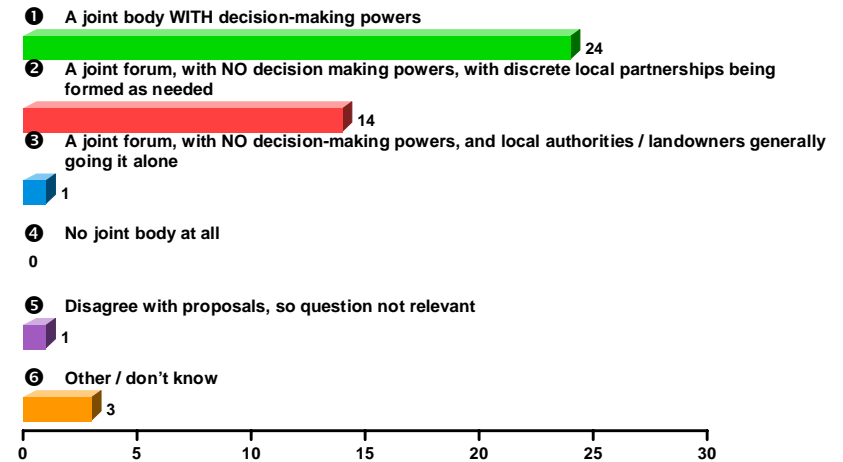


4. To make these proposals happen, we need . . . (select the one which most closely represents your views)

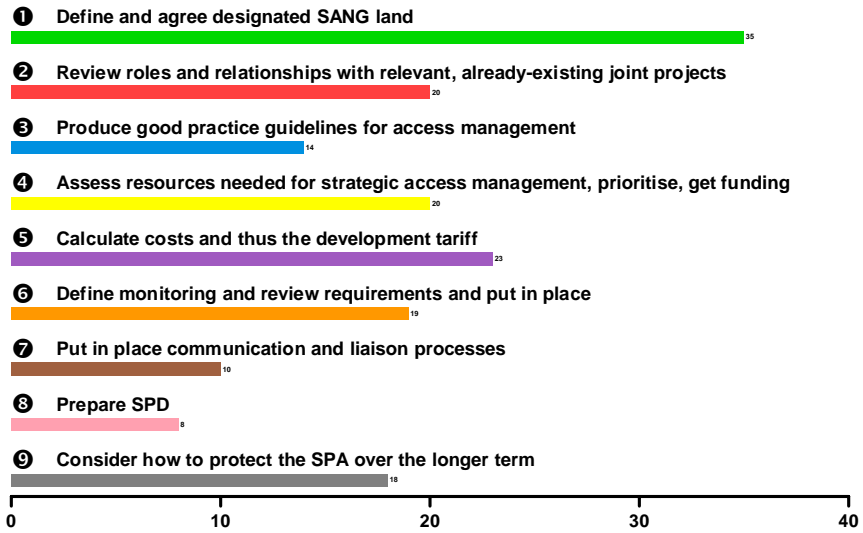
5. There should be a standard development tariff for the whole area



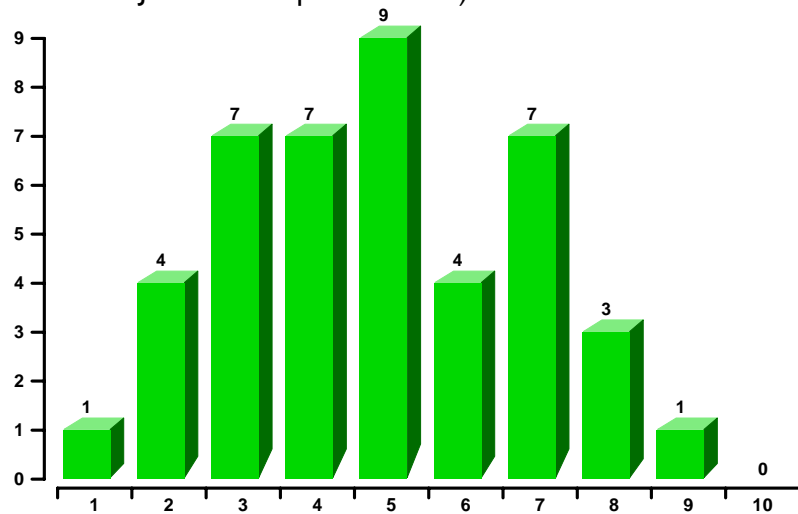
6. Money from a development tariff should be pooled and distributed by a joint body or forum



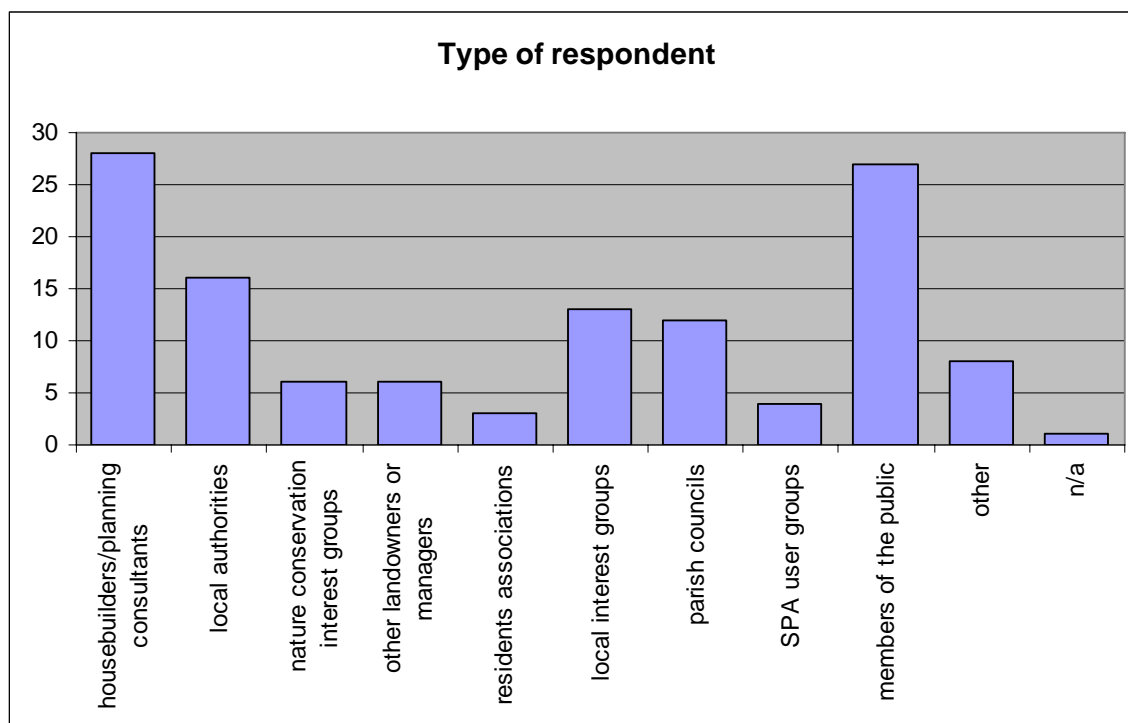
7. What are the delivery priorities? (Assume that an appropriate regional body has been set up) (choose four, equally weighted)



8. In general, how far down the road are we towards a viable vision for the way forward? (where 1 is 'Nowhere. Need to start again' and 10 is 'Vision fine. Just needs implementation')

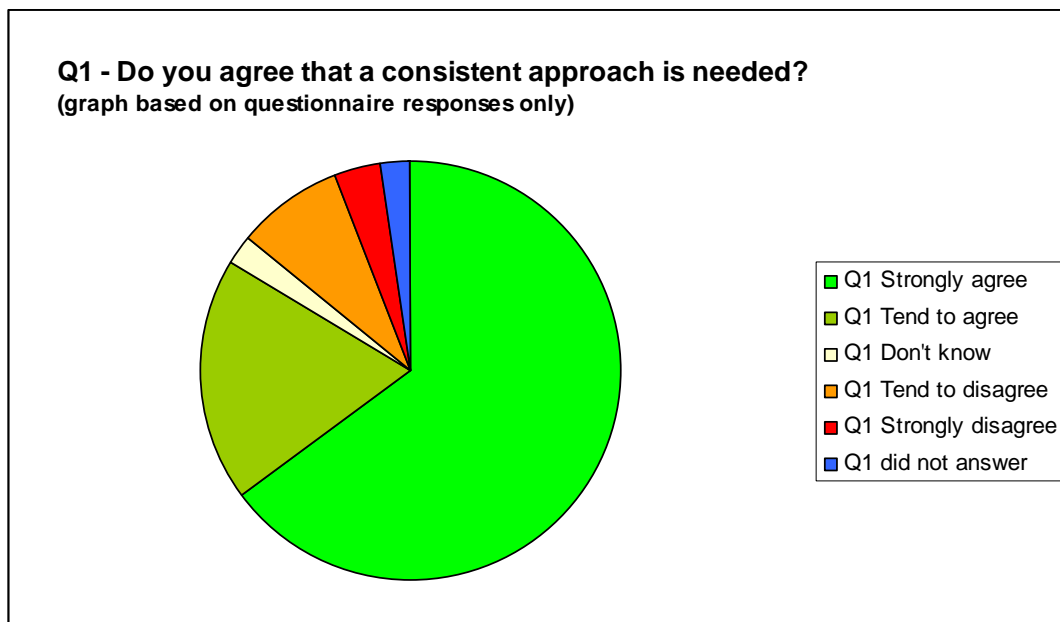


**Summary of draft ISDP Consultation
Type of Respondent**



General comments	
General support for the principles of joint working and a consistent approach	Support welcomed
General support for a three prong approach, but differing views over the balance between those	In the short term the focus should be on SANG and access management as avoidance measures, however, there may be scope for habitat management to be an avoidance measure once the SPA is in favourable condition. The strategy should therefore focus on SANG and access management, but acknowledge that there may be scope in the future for habitat management as an avoidance measure.
But many views that the ISDP should be simpler/more flexible and that a one size fits all approach may not be appropriate	Agreed. The revised strategy should set out overarching key principles for avoidance; however it is acknowledged that local /site specific circumstances vary and there is a need to allow account to be taken of these.
Some concerns about the fundamental principles of the ISDP and their legality	The Assessor concluded that a delivery plan type approach focusing on SANG and access management was appropriate. It is considered that such an approach is an appropriate response to the risks of damage to the SPA.
Some concerns that the draft ISDP is not proportionate (especially housebuilders/planning consultants), although some views that it is not precautionary enough (particularly local interest groups)	It is considered – as a strategic guidance document - that the draft ISDP sets an appropriate balance between the original draft Delivery Plan and the Assessor’s Report; and provides a proportionate – yet precautionary approach. Applicants for planning permission may still choose to go through the AA process.
Questions about evidence base for	The gaps in evidence base are acknowledged, however there is a

visitor impact on the SPA, success of proposed avoidance measures, baseline information, departing from Assessor's report	need for precautionary approach on the best available evidence. The revised strategy should have a strong focus on monitoring – the approach to provision of avoidance measures may need to be amended in the light of the results of new evidence.
Concerns that the Dorset model is not applicable to the TBH	It is accepted that there are differences between the Dorset Heaths and TBH circumstances; however, also considered that there are lessons that can be learned by looking at the approach that has been taken in Dorset
Concerns that the ISDP may not remove the need for AAs on new housing development	The Assessor considered that a delivery plan type approach focusing on the three prongs of avoidance was appropriate. However it is acknowledged that any approach may need to be adjusted to take account of future evidence. Applicants for planning permission may still choose to go through the AA process.
Further clarification sought about timeframe for ISDP	The revised strategy should set out a framework for delivering avoidance measures for the life of the South East Plan (to 2026). A rolling 5 year programme of SANG land delivery and access management measures should be maintained. The revised strategy will be reviewed regularly to take account of monitoring results and new evidence.
Questions whether the ISDP itself requires an AA	Given the strategy's role as guidance about delivering measures to avoid impact on the SPA from development allocated in the SE Plan, which has already undergone AA, it is not considered necessary to undertake an AA on the revised strategy.
Views that the focus should be on protecting the SPA rather than allowing housing development	The levels of housing development proposed in the affected area was not a matter for the draft ISDP consultation. The strategy seeks to protect the SPA by setting out measures to avoid the impact of any new development.



ISDPI Classes of development affected	
General support for principle	Support welcomed
Questions whether ISDP should refer to other types of development (eg hotels, student accommodation,	The purpose of strategy is to provide mechanism to enable housing delivery. Other development will need to be considered on a case-by-case basis.

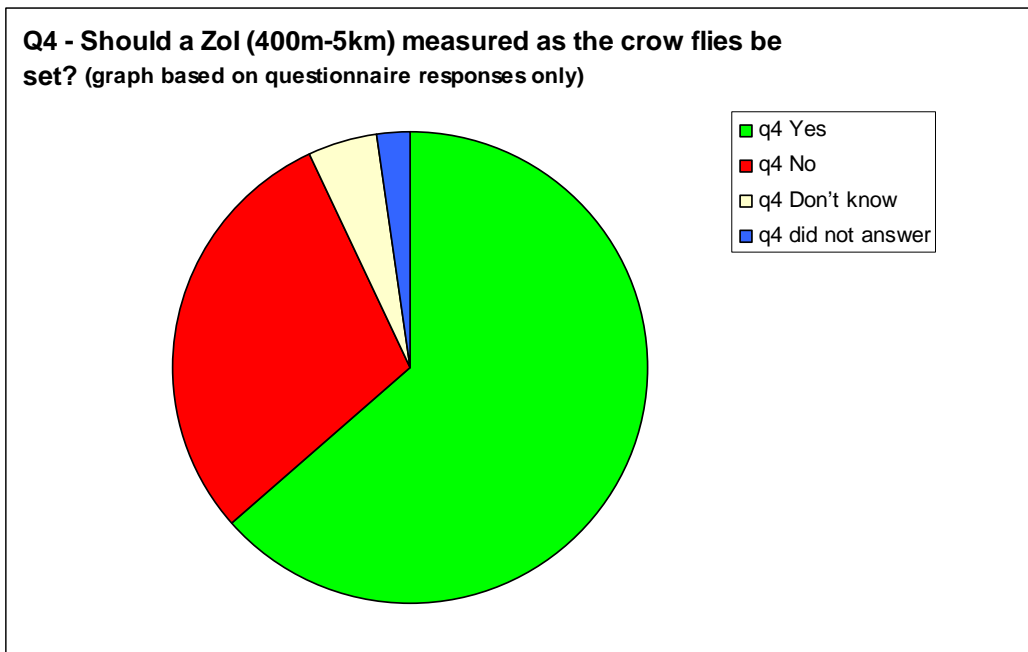
minerals and waste development, commercial development)	
Questions around validity of criteria for care homes, pet restrictions, visitor parking restrictions, staff accommodation	The revised strategy should make it clear that exceptional circumstances may need to be considered by the LPA on a case-by-case basis; and that developers also have the option of undergoing an AA screening for development they do not feel falls within the remit of the strategy.
Concerns about pressures on SPA from other sources (eg climate change, habitat condition, predators)	The focus is to avoid the impact of any likely significant effect from new housing rather than address other threats to the SPA

ISDP2 Development scale and thresholds	
General support for lower threshold of 1 net new dwelling from most local authorities and nature conservation organisations	Support welcomed
Some views that threshold should be set at 10 dwellings to reflect Assessor's report, and questions as to why his recommendation had been rejected.	The Assessor's recommendation is not accepted because it is considered unsound to ignore the in-combination impact of smaller developments. It is suggested, however, that developments of less than 10 dwellings should not be required to be within a specified distance of SANG land, provided that sufficient SANG land is provided across the affected area, as the impact of smaller developments alone on nearby SPA will not be significant.
Alternative suggestions for threshold (including 24+ residents, 10+ threshold for houses and higher (25+) threshold for flats)	Noted, however a threshold of greater than 10 is considered appropriate (see above) and logical as it aligns with other planning definitions of 'major development'.
Suggestions (esp from nature conservation groups) that ISDP should have an upper threshold (ie larger developments should still be subject to AA)	It is agreed that larger developments will have particular requirements for avoidance measures that need to be addressed on a case-by-case basis and the strategy should make it clear that larger developments should be considered individually. It is not considered possible to set an upper threshold given the varied character of the affected area.

ISDP3 Proximity of development – Inner exclusion zone	
General support for identification of exclusion zone	Support welcomed
Some concerns about the need for flexibility (eg to take account of existing levels of development, schemes with pet covenants, the availability of on-site SANG, less sensitive parts of the SPA)	It is agreed that there should be scope for exceptional circumstances to be assessed on a case-by-case basis, however there should be an overarching strategic framework that sets the principle of the exclusion zone, and such exceptions will need to be carefully monitored to ensure that sufficient avoidance measures are being provided.
A variety of views on the definition of impenetrable barriers: some suggestions that the definition should be widened (eg to take account of A-Roads, MoD security fencing); other suggestions that motorways and canals do not represent truly impenetrable barriers.	It is agreed that there should be scope for exceptional circumstances to be assessed on a case-by-case basis, however there should be an overarching strategic framework that sets the principle of the exclusion zone, and such exceptions will need to be carefully monitored to ensure that sufficient avoidance measures are being provided.
Questions over the suggested	The strategy should provide greater clarity about how such

treatment of Reserved Matters applications and amendments to planning permissions.	applications and amendments should be treated.
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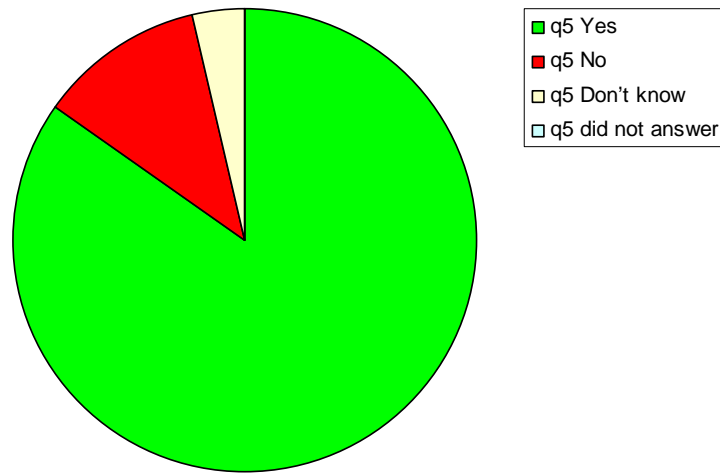
ISDP4 Proximity of development – Zone of Influence	
Support for identification on the basis of both linear and travel distance. The majority of LAs support linear distance, house-builders and planning consultants support use of travel distance. Some questions as to why the Assessor’s recommendations about travel distance have not been carried forward.	On balance, it is considered that the strategy – as a strategic guidance document – should include a Zone of Influence based on linear distance, as this is generally considered by competent authorities to be a more pragmatic method than using travel distance. It is agreed that there should be scope for exceptional circumstances to be assessed on a case-by-case basis, however such exceptions will need to be carefully monitored to ensure that sufficient avoidance measures are being provided.
Some concerns about the need for flexibility (eg to take account of actual travel distance; adjoining countryside; the presence of motorways/canals/other topographical features)	It is agreed that there should be scope for exceptional circumstances to be assessed on a case-by-case basis, however there should be an overarching strategic framework that sets the principle of the Zol, and such exceptions will need to be carefully monitored to ensure that sufficient avoidance measures are being provided.
Some responses considered the Zone of Influence was not precautionary enough (mainly local interest groups), some that it was overly precautionary (some members of the public and housebuilders)	On balance, a 5km zone of influence is considered appropriate as part of a precautionary approach.
Questions over how Reserved Matters applications and amendments to planning permissions should be treated.	The strategy should provide greater clarity about how such applications and amendments should be treated.



ISDP5 – Strategic SANG provision – quantity, location and proximity of development	
Concerns that approach may not be	The strategy should be amended to allow for the provision of

in line with provisions in Circular 05/2005	SANG at a local authority level, or through cross boundary partnership working; to be funded by locally collected developer contributions, in order to allow a clear relationship to be demonstrated between the collection of contributions and provision of SANG.
Concerns that SANG is untested; and about any requirement for developers to provide SANG	A key part of the strategy should be the monitoring aspect, and it is agreed that there may be a need to revise in the light of new evidence. The strategy should allow developers the option of either providing their own SANG or paying a contribution to local authorities towards the provision of SANG.
Some support for the need to look across boundaries for SANG provision	Support welcomed. The ISPD should advocate cross boundary partnership working to provide SANG as a beneficial way forward.
Concerns that SANG must be protected in perpetuity	The strategy should make this clear
Concerns that SANG provision must be coordinated with housing delivery	SANG provision should generally be coordinated with housing delivery at a local authority level or across groups of local authorities working in partnership, rather than across the SPA as a whole.
Questions about evidence base for 2km SANG catchment, and concerns about deliverability. Suggestions that catchment area will be dependent on SANG size and location	Agreed. The strategy should provide guidance on the catchment area of SANG of different sizes, however it is accepted that this may need to be increased or decreased to account for local circumstances.
General support for principle of large SANG near the SPA but concerns about delivery	Noted. The revised strategy should suggest that a range of sizes of SANG should be provided across the area, and highlight the benefits of large SANG.
Concerns that delivery of the proposed standards may require more SANG than anticipated	Noted. Revised proposals for SANG provision should overcome this problem
Some concerns that SANG should be provided on new (rather than existing) open space	The benefits of providing SANG as new open space are recognised. However, it is considered that existing open space has some scope to act as SANG, provided that measures are taken to protect existing public and open access rights, and existing users and nature conservation interests.
Concerns about the need to protect existing rights and designations on existing public open space used as SANG	Agreed. The revised strategy should make clear the need to protect existing public/open access rights.
Some concerns about displacement issues re existing public open space	Careful monitoring is needed to ensure that SPA visitors are not simply displaced, either from one part of the SPA to another, or existing users of public open space that becomes SANG are displaced to the SPA.
Concerns that SANG should be located close to new development in line with policy to reduce the need to travel.	The revised strategy should set out guidance about the catchments of SANG land; however where possible it should be provided close to urban areas to reduce the need to travel.

Q5 - Support for principle of SANG network developed across the affected LPAs (graph based on questionnaire responses only)

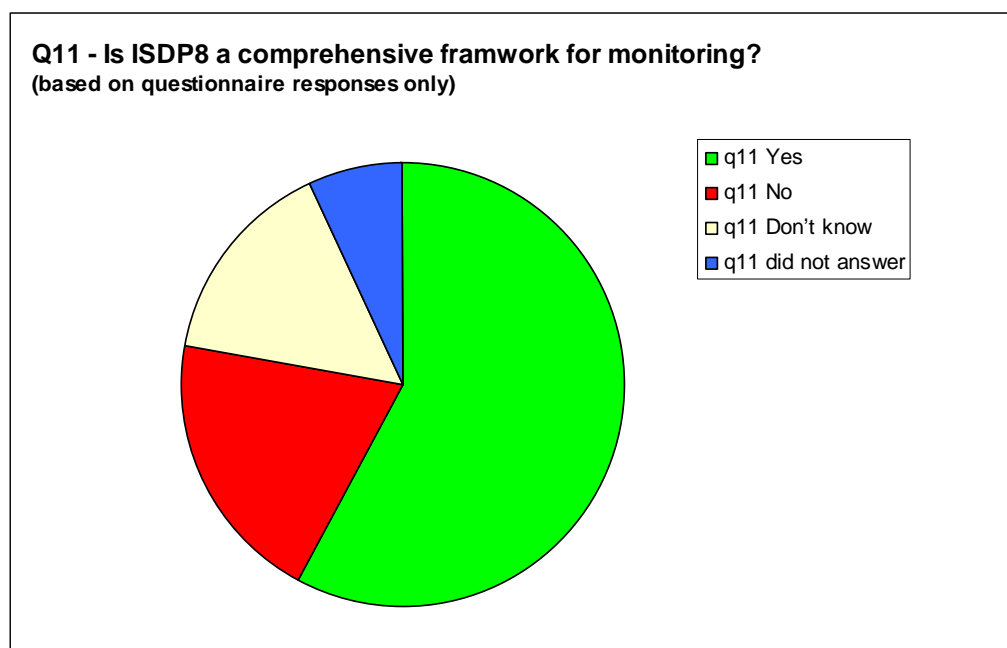


ISDP6 Strategic SANG provision – quantity standards for new development	
General support for 8ha standard, although some respondents support it as a minimum standard whereas others seek the removal of 'at least'	The revised strategy should continue to promote the provision of at least 8ha of SANG per 1,000 people, to allow for the standard to be adjusted to take account of individual circumstances.
A few respondents consider that the 8ha standard is too precautionary (or not precautionary enough).	Noted. An 8ha standard has been agreed by Natural England as appropriate, however there will be a need to monitor this and where necessary review it.
Concerns that the assumption of 2.4 person per dwelling may not reflect local circumstances and /or future trends, and there should be more flexibility	Noted. The average occupancy rate across the 11 affected authorities in 2006 was 2.44 therefore a strategic standard of 2.4 is considered appropriate. It is accepted that this may need to be revised where robust local evidence suggests an alternative figure, and over time to take account of population trends.
Some support for the principle of discounting but concerns that further information is needed. Also questions about how recreation capacity should be assessed.	It is considered that discounting is best addressed at a local, site by site level, however the strategy establishes the principle.

ISDP7 Strategic SANG provision – size of SANG sites and parent land	
General support for the principle of a green infrastructure network and for a range of site sizes; some concerns about need to consider links between sites and rights of way	Support welcomed. The strategy highlights the benefits of providing SANG as part of a wider network.
Questions about whether a 2ha SANG is too small to attract users; and concerns about the need for further evidence	It is considered that small SANG sites have an important role to play in providing local open space, especially within a wider network of SANG.
Questions about whether a 15ha parent site is deliverable; some question the evidence base for 15ha standard. Some views that the	The revised strategy should express a preference for SANG to be located within a wider open space or network of spaces without being so prescriptive about the size.

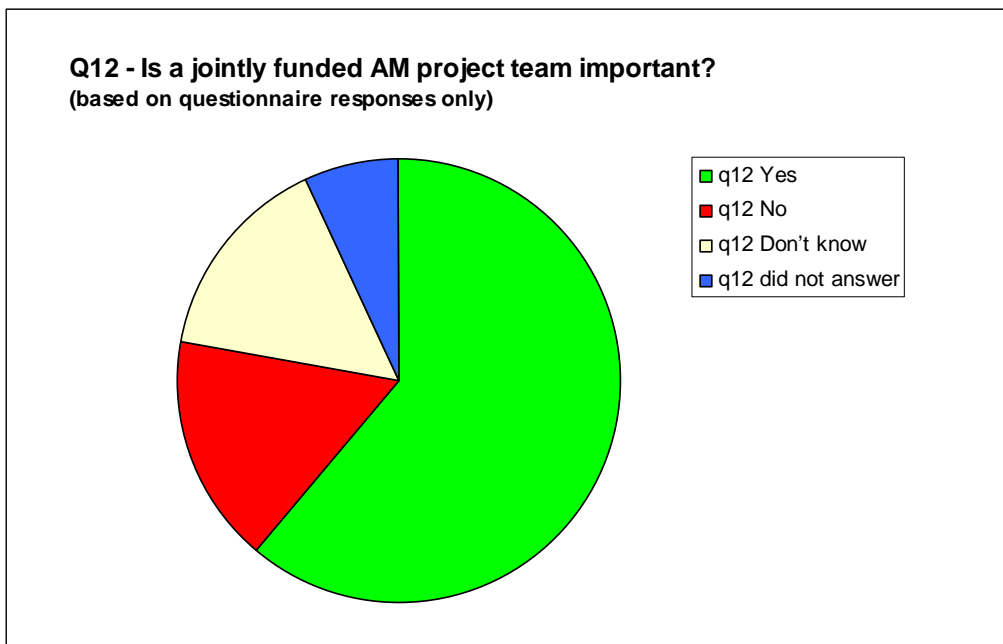
location of SANG is more important than the size	
Concerns that there should be more flexibility in application of size standards	The revised strategy should express a preference for SANG to be of at least 2ha in size, and located within a wider open space or network of spaces.

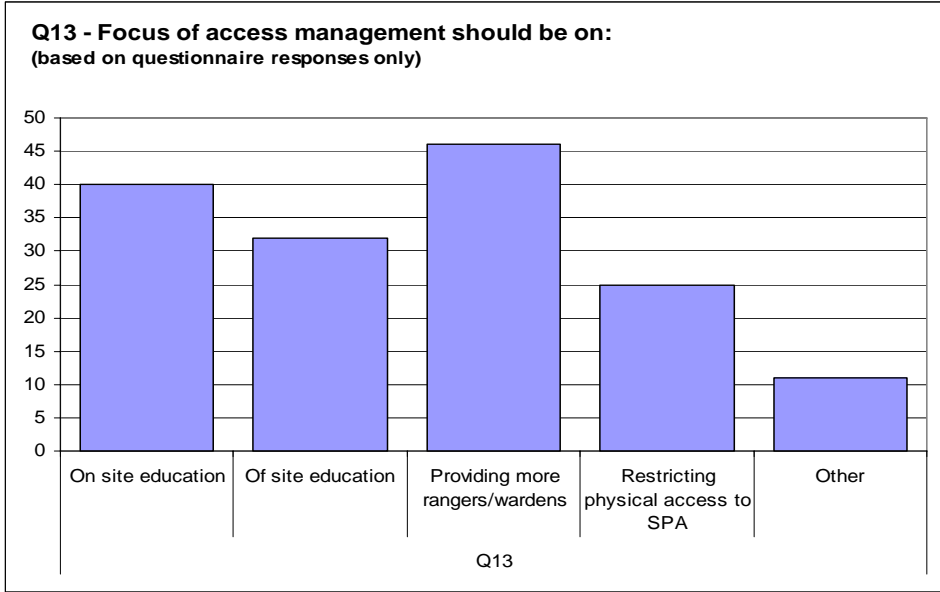
ISDP8 Strategic SANG site quality requirements	
General view that the policy is somewhat over-prescriptive, and that quality standards should be more flexible; and that the majority of standards should be seen as 'desirable' rather than 'essential'.	Noted. It is not considered that the revised strategy need include detail about quality standards in the light of the existing NE advice.
Questions about the rationale for changing Natural England's advice on quality standards	Noted. It is not considered that the revised strategy need include detail about quality standards in the light of the existing NE advice.
Some views that wardens on SANGs should not be a priority; other views that rangers are more likely to be effective than hard infrastructure.	Noted. There will be a need to consider the particular needs of individual sites.



ISDP9 Resources for Strategic Access Management	
General support for principle of strategic access management	Support welcomed
Concerns that access management must not restrict public/open access rights on SPA and SANG land	Agreed. The revised strategy should make clear the need to protect existing public/open access rights.
Concerns that other nature conservation interests must be protected throughout the provision	Agreed. The revised strategy should make clear the need to protect other nature conservation interests on the SPA.

of access management measures	
Support for focus on softer measures, although some views that there is a role for more restrictive measures	The strategy focuses on provision of softer measures, however it is agreed that more restrictive measures may be an option, so long as these do not compromise existing public/open access rights.
View that access management would be better delivered by existing landowners and managers expressed by most LPAs and landowner/managers with additional funding (and maybe with assistance from volunteer groups); but that there may be a role for a central team to coordinate and monitor the process (perhaps hosted by NE)	The revised strategy should focus on the provision of access management measures by existing landowners and managers in accordance with an overarching SPA access management strategy, with funding for this collected through developer contributions and strategically pooled and managed by an existing body or organisation. Expressions of interest are invited to the Board meeting on 27 March.
Concerns also that tariff contributions must not be used to fund existing duties of landowners/managers	This is not the intention. The tariff must be spent on provision of avoidance measures.
Concerns that access management should include access both to and on the SPA.	The revised strategy should be clear that access management covers both the SPA and SANG.
Concerns about lack of detailed work and monitoring programme	Noted. The revised strategy should identify a programme of actions to provide a more detailed work and monitoring programme.
A number of respondents highlighted the opportunities presented by the Blackwater Valley Countryside Partnership	Opportunities noted. The revised strategy should set out that such organisations have a clear role to play.





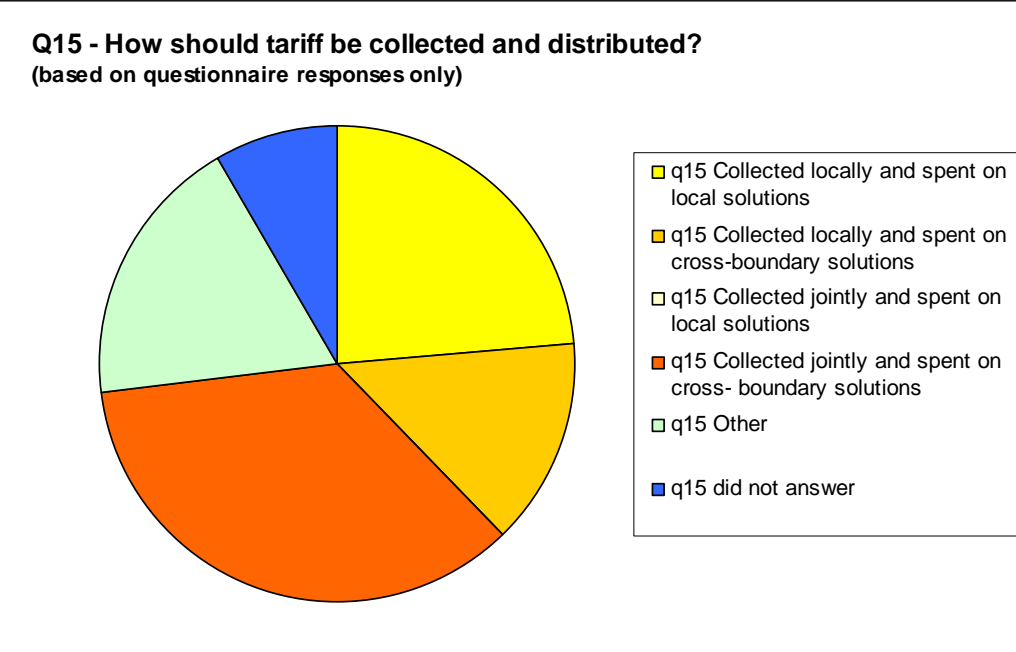
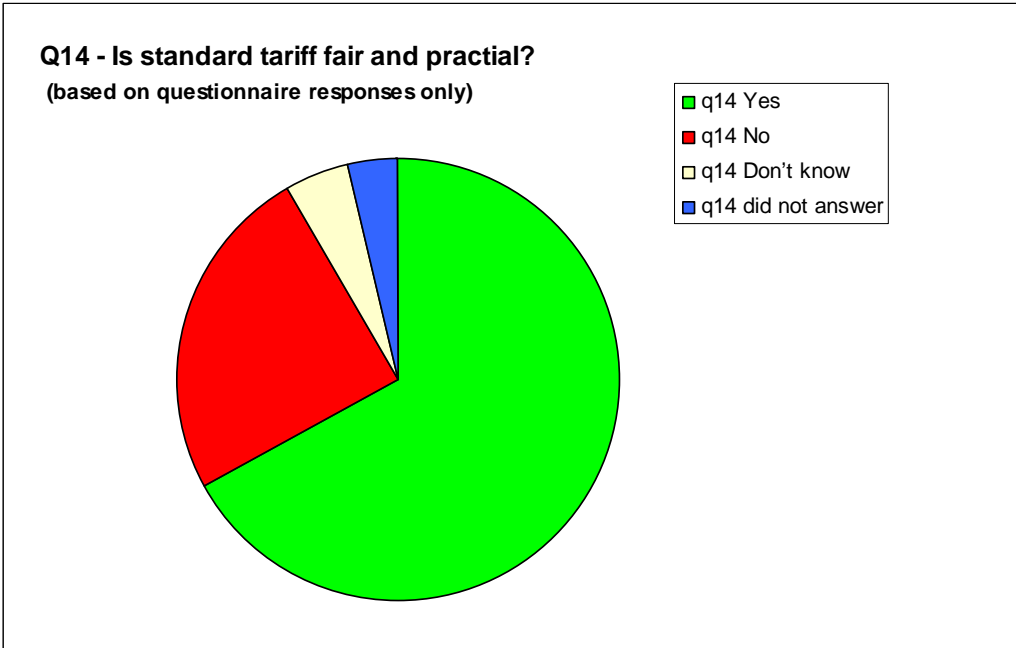
Other suggestions included:

- Only restrict access in breeding season
- Access management to help avoid fires and antisocial behaviour
- A dedicated SPA police force
- Dogs on leads/ban dogs/dog bins
- Need for consistency

ISDP10 Habitat Management	
Views that further clarity needed over the statutory duties of landowners (which cannot be funded by developer contributions) and the potential for additional measures.	The revised strategy should make the distinction between the role of habitat management as avoidance and the existing duties of landowners.
Some (especially housebuilders/planning consultants) consider that HM should be available to developers as an avoidance measures. Concerns (especially by nature conservation bodies) about the extent that this could be done.	See above.

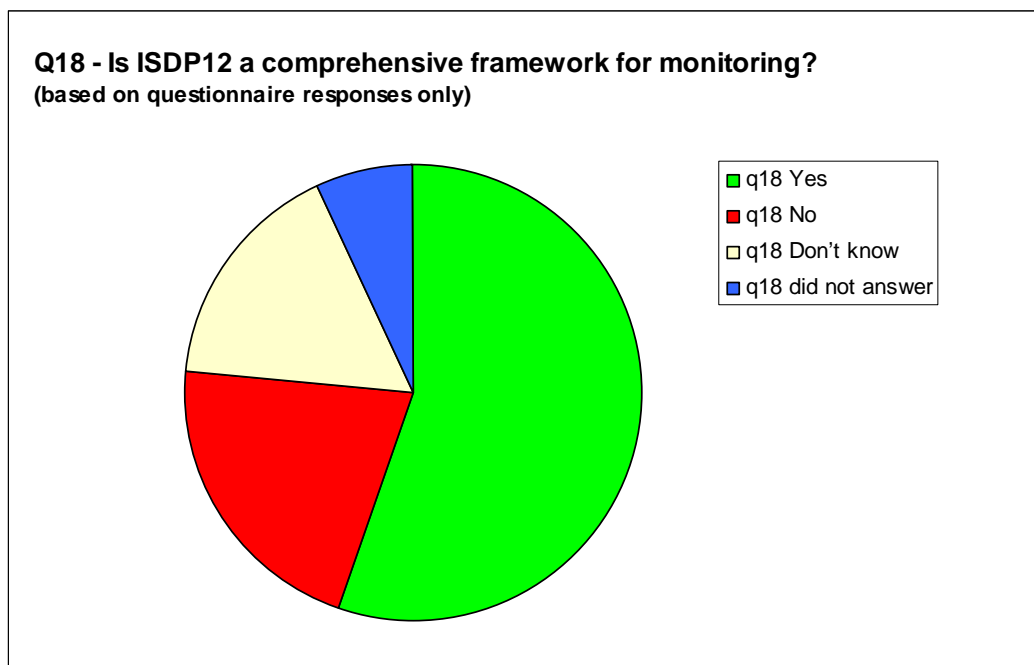
ISDP11 Developer contributions – a standard tariff	
Questions about legality of proposed mechanisms, the need to retain local democracy and not fetter LPAs, and about the limited powers of the Board; and some concerns that the principle of collecting contributions is inequitable ('a tax on development') and not proportionate	The revised strategy should propose that funding for SANG should be collected and allocated at a local level or through cross boundary partnerships in order not to fetter LPAs; and that access management and monitoring should be funded through developer contributions pooled and managed strategically by an existing body or organisation rather than the Board.
Little support for pooled tariff to fund strategic SANG (especially from local planning authorities); and concerns about the practical difficulties of agreeing a standard tariff	The revised strategy should now propose that SANG should be funded at local authority level or across groups of local authorities working in partnership through locally collected and allocated developer contributions.
However, some support for principle of some strategic access management and	Support welcomed. The revised strategy should propose that a strategic element be added to locally collected SANG

monitoring funded by developer contributions.	contributions to fund strategic access management and monitoring.
Some views that the tariff should also cover habitat management	See above.
Concern that more information should be provided about tariff levels, collection, and distribution; and (especially from housebuilders/planning consultants) that there is a need for clarity and transparency and further consultation on tariff levels	Noted. The revised strategy should identify a programme of actions including costing access management and monitoring measures. This should form the basis of a strategic charge which will be added to local developer contributions. This work will be reported to the next Board meeting.
Support for the principle of seed funding, and views that this is urgently needed	The RIF provides a potential source of seed funding – where a need for seed funding is identified, the next step is for the local authority to calculate the costs of land acquisition and/or upgrading, identify a programme of works and develop mechanism by which funds will be recouped.
Range of views on what the basis for tariff collection should be – some support for per bedroom basis; some support for 2-tier approach; some support for alternative methods	The revised strategy should suggest that SANG provision be funded by locally collected and calculated tariffs. Would it be useful for the SDP to provide LPAs with guidance as to the preferred approach?
Range of views on the proposed definition of perpetuity – some housebuilders consider it is too long, some (especially nature conservation groups) consider it is not long enough.	Noted. The revised strategy should identify a programme of actions including working up the detail of strategic contribution calculations.
Concern that other s106 tariffs/contributions should be considered, along with possible role of the RIF	Noted.
Concern that the tariff should not be used to fund existing LPA duties	This is not the intention. The tariff must be spent on provision of avoidance measures.
Suggestions that there should be flexibility to reduce tariff contributions to take account of eg lack of parking, pet covenants, provision by developer of SANG/ access management measures.	Noted. There is scope to reduce contributions if SANG and/or access management is provided by the developer.



ISDPI2 Strategic Monitoring and Review	
General support for some strategic monitoring; and opportunities to make use of volunteers	Support welcomed.
Concerns that not enough detail included in policy – need for work programme and responsibilities, timescales for action, timescale and triggers for review, identification of what further research is needed	Noted. The revised strategy should include a programme of actions which includes the need to work up a detailed monitoring strategy building on the work commissioned by NE.
Some concern about lack of conservation objectives and/or baseline information	Noted. The revised strategy should include a programme of actions which includes the need to work up a detailed monitoring strategy building on the work commissioned by NE.

Views that the results of monitoring must be made public	Agreed.
Seeking clarification over need for SANG delivery in advance of housing occupation.	Sufficient SANG should be provided in advance of housing occupation to ensure that there is no likely significant effect., however, options for overcoming short term delays in the provision of agreed SANG should be explored.



ISDP13 Joint working	
General support for principles of joint working, but also general view that it will not be easy	Support welcomed.
View that a joint SPD/DPD is unrealistic and LPAs should undertake individually; some support for local authorities working together in smaller clusters	It is recommended that the revised strategy be endorsed by the Board, and by individual local authorities as the basis for developing/reviewing local or joint miniplans, SPDs or DPDs.
Concerns that the JSP Board do not have sufficient powers to deliver the proposals; some raised need for more housebuilder representation on the Board	Noted. It is proposed that SANG be funded by locally collected tariffs, and that strategic access management and monitoring be funded by pooled contributions managed not by the Board but an existing authority/body on behalf of the constituent authorities. The Federation of Master Builders have been invited to sit on the Board
View that policy needs to provide more information on responsibilities and funding; also how proposals sit with other tariffs/contributions	Noted. The revised strategy should include a programme of actions for delivery.