

Annex A

**Analysis of Responses to Consultation
on the Draft Scoping Report**

Overview

Consultation on the draft Scoping Report for the strategic environmental assessment of the Review of the Chilterns AONB Management Plan took place over the period XX December 2007 until 21st January 2008. Comments on the draft report were invited via the Conservation Board's website, where a copy of the Scoping Report was posted, and XX organisations were specifically invited to comment.

20 responses were received, from the following organisations and individuals:

National and regional organisations

Cotswolds Conservation Board (no comments)
East of England Regional Assembly (no comments)
Environment Agency
Highways Agency (no comments)
Natural England
RSPB

Local authorities

Chiltern District Council
Dacorum District Council
Luton Borough Council
North Herts District Council
Oxfordshire County Council
Pitstone PC

Parish Councils

Chalfont St Peter PC
Chepping Wycombe PC
Chesham Bois PC (no comments)
Harlington PC
Hughenden PC
Lane End PC

Individuals

Cllr Don Worlding
Mr Mike Render

Scoping report reference	Consultee	Comment	Response
General	Environment Agency	In general the SEA Scoping report is comprehensive, it is clearly set out and clear explanation of how it fulfils SEA Directive requirements is provided. However, some of the proposed SEA objectives do not appear to reflect the key environmental issues identified and many of these issues do not appear to reflect the baseline information or the findings of the plan and programme review.	Noted – detailed points addressed below
General	Environment Agency	It would have been useful to have included a map showing the Chilterns AONB in the Scoping Report.	Accept
General	Oxfordshire County Council	The scoping report for the SEA looks to be comprehensive and a good basis on which to proceed. We have no detailed comments.	Noted
General	Chiltern District Council	We are generally happy with the Scoping Report	Noted
General	Luton Borough Council	Suggest that there is a list of all the acronyms.	Accept
General	Luton Borough Council	Font size may need to be larger for public documents.	Noted
General	North Herts District Council	Should the scoping report acknowledge the pressure for housing development in or just outside the ANOB (and attempt to direct it towards those areas that are best able to accommodate it) ? The Management Plan could approach this from a wider perspective than that afforded to the individual LPA's.(I acknowledge that you mention suburbanisation on page 14)	Not directly a role for the Management Plan – though could seek to influence future spatial planning decisions by highlighting issues of managing nationally important landscape in the face of nearby rapid growth
General	Chalfont St Peter PC	Suggest that in future a brief synopsis of the consultation paper in layman's terms is provided so it is much easier to read and understand and save much time and paperwork.	A non-technical summary of the Environmental Report on the likely significant effects of the revised Management Plan will be provided as part of the consultation on the draft revised Plan.
General	Chepping Wycombe PC	A map with notes attached would be useful to facilitate a clearer picture of the area under consideration.	Accepted – map(s) will be included in the Environmental Report

General	Chepping Wycombe PC	Has any assessment been carried out to determine if any, of the many desirable objectives in the document might be in conflict with each other?	Table 3 provides an assessment of the compatibility of the SEA objectives. An analysis of the compatibility of the draft Management Plan objectives with the SEA objectives will be carried out
General	Harlington PC	There is very little for the Council to criticise within the report and to be objective is difficult. It has therefore reserved comments and suggestions to the local area which includes Sundon Hills Country Park and its environs.	Noted – suggestions made are not directly relevant to the draft Scoping Report but to the Management Plan and will be considered in that context
General	Hughenden PC	A far-reaching document and the Parish Council members agreed with the principles contained therein.	Noted
General	Lane End PC	Did not receive Appendices 1 or 2 and so can only make limited comments	This is unfortunate. Appendices were inadvertently omitted from some initial consultation requests, but sent later. They cannot have reached the respondent in this case.
General	Lane End PC	A glossary of abbreviations would have been helpful, and it is suggested they be included in the final plan	Accept
General	Pitstone PC	(a) that quarrying in Pitstone may (soon) come to an end, although we have no definitive timetable - you may wish to include the owners in your consultation process if they are not already (regarding what will happen to the site). (b) you may wish to include the College Lake Wildlife Reserve in the process, if they are not already covered.	Noted
1. Background			
1.2.8	Natural England	S166 of NERC Act 2006– changes to S87 CRoW – For AONB <u>Conservation Boards</u> - as per NPA’s 3 rd purpose and S62 of NERC. This removes any limit on spending on such activity. Probably a minor consideration.	Accept – amend second bullet
2. Approach to Strategic Environmental Assessment			
2.2.4	The RSPB	Include the prefix ‘The’ when naming the RSPB, i.e. ‘ <i>The Royal Society for the Protection of Birds</i> ’.	Noted
3. Establishing the Context			

3.1.3	Environment Agency	We are pleased to see that the potential cumulative effects of the AONB Management Plan with other plans and programmes will be identified	Noted
3.1.5	Natural England	Biodiversity, fauna, flora W&C Act heading - refers to therebeing 3NNRs and 54 SSSIs in the Chilterns. On page 14 para 3.2.19 it states there are 63 SSSIs (Appendix 2 refers to 63 which is the correct?)	The correct number is 54 – para 3.2.19 & Appendix 2 will be corrected.
3.1.5	The RSPB	Include the EC Birds Directive in this list (although there are not any SPAs in the AONB at present, provisions in the Act are relevant to the AONB for Annex 1 species). The prefix ‘EC’ should be used for both Directives. Recommend: ‘ <i>EC Habitats/Birds Directives – the management... of a Special Area of Conservation (SAC) or Annex 1 Bird Species</i> ’.	Noted - EC Birds Directive is included in Appendix 1 but is not considered a <u>key</u> influence because of absence of SPAs
3.1.5	The RSPB	The Countryside and Rights of Way Act 2000 (the most recent amendment to the WCA) should be mentioned, as this increases protection for SSSIs and provides for better management of AONBs. Recommend: ‘ <i>Wildlife & Countryside Act 1981 (as amended by the CRow Act 2000) - ...</i> ’	Accept – CROW Act fundamental and should be included for a variety of reasons
3.1.5	Dacorum Borough Council	PPS1: Delivering Sustainable Development and particularly the supplement on Planning and Climate Change should be referred to as key documents.	Accept
3.1.5	Dacorum Borough Council	In addition to ‘Local Plan polices’ it would be appropriate to also refer to adopted and emerging policies within the new Local Development Framework (LDF) system. Alternatively, the terms ‘Development Plan polices’ could be used instead as this would cover both local and regional policies.	Agreed, would be better to refer to Development Plan policies – as LDDs are adopted so reference to Local Plan policies will become redundant
3.1.5	Chiltern District Council	Suggest under “Water” that there should be reference to PPS25	Accept
3.1.5	Chepping Wycombe PC	(Re Woodfuel Strategy for England) How about clearing out woodland of dead and diseased trees to use (as fuel) as well as specifically grown ones?	This would be the intention.
3.1.5	Lane End PC	Should this plan include changes in policy towards the Green Belt and its implementation by Natural England?	National policy remains as set out in PPG2
3.1.5	Lane End PC	How will Bucks County Council and possibly other Councils	Include under ‘Material Assets

		Rights of Way Improvement Plans (ROWIP) affect the management of the AONB?	
3.1.5	Mr Mike Render	I would suggest that the Regional Forestry Frameworks for both East and South East (Woodland for Life and Seeing the Wood for the Trees respectively) are of equal relevance as English strategy (ETWF).	Accept
3.2.5	Environment Agency	We are pleased to see that socio-economic information will be included in the environmental baseline to support the assessment of social and economic impacts	Noted
3.2.5	Chiltern District Council	One of the aims of the SEA process should be to avoid adverse effects	Accept. Need to clarify the terms “avoid” and “mitigate”
3.2.21	Mr Mike Render	Should read "There are 9,733 hectares of Ancient Woodland (AW - 12% of the AONB area). Of this, 4,134 hectares are Plantations on Ancient Woodland Sites (PAWS - 42.5% of the ancient woodland) which should be restored to more natural conditions."	Accept
3.2.23	The RSPB	This is incorrect. The Breeding Bird Survey of the Chilterns AONB 2002 (Shurmer 2002) indicated that the Chilterns AONB was of national importance for corn bunting and linnet (having over 1% of their British populations). Populations of skylark and yellowhammer are above those that would be generally expected on a random site of this size, but are not of ' <i>national importance</i> '. See Table 5 on p18 of the CCB/RSPB BBS report. Also, mention that these species are all red-listed as being of high conservation concern. Recommend: ' <i>A survey in 2002 indicated that the Chilterns AONB holds nationally important populations of corn bunting and linnet, both red-listed as being species of high conservation concern. Above average population of skylarks and yellowhammers, both red-listed, are also present.</i>	Accept
3.2.24	Natural England	Unsure of relevance of the Isle of Wight lowest average income?	Taken from source survey. Could be omitted without loss
3.2.30	Natural England	'Over 50% of land is arable and set-aside'. For one, no longer relevant to worry about set-aside, and two, set-aside is just a	Accept

		type of arable crop, so does not need listing separate as the land is still arable.	
3.2.30	Natural England	"the principal crops grown are cereals, mainly wheat and barley and oilseed rape with a small amount of oats". Oilseed rape is not a cereal.	Accept
3.2.30	The RSPB	With set-aside set at 0% for the 2008 growing season, and likely to be phased out completely, consider rewording this. Additionally, oil seed rape is not a cereal crop, but the wording given suggests this.	Accept
3.2.30	Chepping Wycombe PC	Why cannot set aside land be used for trees/crops for bio fuel production instead of paying farmers to look after it for the environment?	Set-aside now discontinued
3.2.32	The RSPB	The use of 'OHLS', which presumably stands for Organic Higher Level Stewardship, needs clarification from Natural England. This is not listed as being part of Environmental Stewardship, and it may be more accurate to say ' <i>...(includes one organic farm)...</i> '.	Accept
3.2.45	The RSPB	Recommend removing this point. This figure may no longer be correct, as management plan options have been removed from Entry Level Stewardship (which is the part of Environmental Stewardship that includes these plans, though this is not made clear). This change has been backdated to 1 January 2007, so some of the agreements included in the figure of 43 may no longer contain plans. The four management plan options are not currently deemed appropriate for an agri-environment scheme.	Reword 3.2.45
3.2.47	Chepping Wycombe PC	The issue of water supply needs a much higher priority level than it is currently given. The continuing programme of leaks control is not in itself enough. May need desalination plants or new reservoirs	Noted – but not matters for the AONB Management Plan to lead on.
3.2.19	Environment Agency	The information in paragraph on river water quality in the Chilterns and under the column headed key facts in the table in Appendix is very summarised. The most recent data available is for the period 2004 to 2006. (see comment re. Appendix 1)	Noted
4. Key Environmental Issues			
General	Environment Agency	It is not clear how the key environmental issues set out in Table	Noted - review

		1 have been identified as many do not appear to reflect the baseline information in Chapter 3 or the results of the plan and programme review. .	
General	Environment Agency	The purpose of the SEA scoping stage is to identify likely significant issues and to scope out issues that are not likely to be significant in order to focus the SEA on the key issues for the plan that is being appraised.	Accept
General	Environment Agency	There are no key environmental issues relating to soil identified in Table 1, however, objective10 relates to soil quality and the existence of soil management plans is mentioned in the baseline information in paragraph 3.2.45, although no trends are provided in Appendix 2 so it is not obvious whether there are problems relating to soil quality in the AONB.	Noted – but lack of information prevents judgements being made
General	Dacorum Borough Council	The table focuses on ‘issues’ in terms of ‘problems.’ Dacorum’s Scoping Report for its DPDs also highlighted potential opportunities as well as threats – as this angle may also help inform policy development (particularly as we are told that policies should be positively rather than negatively worded where possible).	Accept – review the analysis and presentation
General	Luton Borough Council	Seems comprehensive	Noted
General	North Herts District Council	Should the scoping report acknowledge the pressure for housing development in or just outside the ANOB (and attempt to direct it towards those areas that are best able to accommodate it) ? The Management Plan could approach this from a wider perspective than that afforded to the individual LPA’s.(I acknowledge that you mention suburbanisation on page 14)	Not directly a role for the Management Plan – though could seek to influence future spatial planning decisions by highlighting issues of managing nationally important landscape in the face of nearby rapid growth
Landscape	Dacorum Borough Council	Mention the increase in light pollution and decrease in tranquillity?	Accept – but limited scope for Management Plan to do anything about it
Biodiversity, flora and fauna.	Natural England	Beech woodland on chalk in SE England must be threat – due to drought induced stress? And also storm damage? (Also could be repeated under climatic factors	Already covered under first bullet point, but maybe develop
Biodiversity, flora and fauna.	The RSPB	There should be a bullet point on farmland birds. With the nationally important corn bunting population present, and low	Accept

		<p>numbers of tree sparrow, turtle dove, grey partridge and lapwing, it is important that farmland bird recovery work is a priority. The recovery of declining farmland birds is one of the UK governments PSA targets. A recommended point could be:</p> <p><i>‘Declining populations of farmland birds – species such as tree sparrow and turtle dove are uncommon or absent and grey partridge and lapwing are only present in low numbers. The Chilterns AONB holds nationally important populations of corn bunting and linnet, and targeted efforts should be made to conserve these’.</i></p>	
Biodiversity, flora and fauna.	The RSPB	You should also be aware that woodland bird conservation is becoming a priority, though it is possibly too early to be considering how this relates to this plan.	Noted
Biodiversity, flora & fauna	Dacorum Borough Council	Mention the occurrence of rare ecosystems i.e. beech woods and chalk streams?	True – present in terms of stewardship of national resource?
Population	Dacorum Borough Council	The ageing population may also have implications for the rural economy	Accept as true, but limited relevance to the scope of the Man Plan
Climatic Factors	Environment Agency	The first issue under the climatic factors heading should include reference to the implications for water availability and flood risk.	Accept
Material Assets	Dacorum Borough Council	Refer to ‘access to specialist / traditional skills training and expertise’	Accept – presumably in the sense of ‘difficulty of access to....’ In terms of farm and woodland management
Material Assets	Environment Agency	The issue under farming regarding the increase in larger holdings contradicts the baseline information in paragraph 3.2.31	Check the Ag Census and amend as necessary
Material Assets	Environment Agency	It is not clear where the information regarding the increase in non-food crops i.e. opium has been obtained from.	Omit reference to opium
Material Assets	Environment Agency	The implications of an increase in bio-fuel crops should maybe considered.	Accept
Material Assets	Natural England	‘High demand for grain leading to high prices’ heading. "threats to habitats created/restored through agri-env schemes, especially buffer strips." How long term is this threat? If only an up and down in the market, is it needing to be listed. Also, is a down	Revise this issue. High prices might lead to intensification but they might also result in more money available for on-farm conservation management.

		turn in prices not a threat? - then more land may be ploughed to maximise returns? I'm not sure high prices will have a great deal of impact - with the high prices of 13 years ago, we saw more people taking on CSS and capital items as they could now afford to do the work. The threat to buffer strips is that people are naturally coming to an end of schemes and then not getting into another scheme, so they may gradually plough them back. It is not just as a result of high prices.	Issue is – which way will it go, and how will the pattern vary across the AONB?
Material Assets	The RSPB	‘High demand for grain leading to high (commodity) prices’. There are threats to farmland habitats not just created through agri-environment schemes. For example, a change in land use from grassland to arable leading to lower habitat diversity. Is there an evidence base for buffer strips being ‘especially’ under threat? ‘Edge’ habitats, such as buffer strips and hedgerows, are the most likely options to remain popular in agri-environment schemes. With land managers wanting to take advantage of high prices and maximise yields, the more technical ‘in-field’ ES options, such as wild bird seed mixtures and low input crop management, are arguably more likely to receive poor take up. Again, note that set-aside is effectively due to disappear.	Noted – as immediately above
Material Assets	Natural England	Non food crops – bio fuels and Miscanthus / SR coppice? More likely?	Accept
Material Assets	Natural England	Also under Land use conflicts ?	Accept
Material Assets	Mr Mike Render	Woodland management. I would disagree that Habitats Regs and H&S issues are likely to have a significant impact. Both can quite readily be resolved by good management practices.	Noted
Material Assets	Mr Mike Render	Trees. This is not well worded. It may be that the establishment of a veteran tree population could raise more issues over tree safety but I am not aware of any evidence to indicate an increase in fungal activity that would reduce the life expectancy of trees.	Noted
Water	Environment Agency	The first issue under the water heading should acknowledge that there is pressure on water resources due to increased development.	Accept
Water	Environment Agency	We are aware that some inappropriate management of river banks is evident on some of the chalk streams in the area. For example, lack of fencing to prevent poaching (by cattle) of the	Noted – add to Table 1

		stream banks, adversely effecting bank side vegetation and the ability of the river corridor to support protected species such as water voles and lack of tree works (pollarding or coppicing) leading to lack of light to the stream and consequent effects on biodiversity.	
Water	Natural England	Watery issue need to be expanded re aquifer recharge and abstraction issues – any water quality issues in aquifers or surface waters – especially if related to drinking water ?	Accept
Water	North Herts District Council	Should there be more on water resource management in respect of Sustainable Drainage Systems in the scoping report? – I know that there is mention of the EU Water Framework Directive on page 10, (and water is covered under climate change and in its own right on page18) and that all local authorities within which the AONB falls will have this covered within their forthcoming Local Development Frameworks. Nevertheless, the AONB Management Plan is potentially able to provide a unique overview and holistic approach in respect of the Chilterns. It is able to encompass the various LPA and County boundaries. The Conservation Board could promote or provide insight on the best locations for e.g. flood control and erosion measures (balancing ponds / swales etc) as well as indicating Sustainable Drainage Solutions to planners when consulted on development proposals. You may of course feel that this is outside the scope of the scoping report.	This is an issue for the management plan - measures to address the sustainability objectives of the SEA, not objectives themselves
Air	Environment Agency	It is not clear whether the issue relating to atmospheric deposition specifically effects the AONB as the baseline information states that there are no Air Quality Management Areas in the AONB and that information on air quality is lacking (paragraph 3.2.50).	Check with Natural England
Air	Dacorum Borough Council	Refer to increased air pollution from growth of traffic and congestion	Accept
5. The SEA Framework			
General	Environment Agency	The objectives themselves are very high level and do not appear to be specifically applicable to the Chiltern AONB Management Plan. We are pleased to see that assessment criteria have been	Noted

		used to help tailor the SEA Framework to the plan being assessed. However, as discussed in our response to question 3 above and stated in paragraph 5.1.2 of the SEA Scoping Report, the SEA objectives should be based on the baseline information, plan and programme review and key environmental issues. This will help make them applicable to the plan. Some of the objectives and associated assessment criteria do not appear to relate to the key environmental issues identified in Table 1, the baseline information or the plan and programme review. Examples are given under our comments on the objectives below.	
General	Environment Agency	There is no flood risk objective included. We note that the baseline identified that flood risk was low in the Chilterns, however, as flood risk is likely to increase with climate change we would suggest that it is either considered as part of the assessment criteria relating to a climate change adaptation objective or Objective 9.	Include flood risk criterion in Objective 9 revised to relate to water management rather than water resource management
General	Natural England	OK in scope but would prefer if they were framed as objectives (goals) rather than policy / actions	We believe they are framed as objectives
General	Natural England	Think they (the objectives) should be neutral and not about enhancing – think SEA is about damage limitation, not enhancement.	Disagree. Govt guidance is that SEA objectives should be devised to test the environmental effects of the plan or to compare the effects of alternatives. Surely it is reasonable to see if the Plan will bring enhancement of a resource, not merely not damage it? See also NE's own guidance where objectives aim to enhance
General	Natural England	There should be an inter relationship objective – this is quite clear (my emphasis) in the guidance <i>(ANNEX I - Information referred to in Article 5(1) “...f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;”)</i>	This is a good point – we certainly need to identify synergetic effects and instances where and trade-offs between satisfying different criteria may be needed. But we believe this is best done as a discrete exercise following the initial assessment against the ‘theme’ objectives, rather than through an additional objective in the

		<p>I suggest using one or other: :</p> <ul style="list-style-type: none"> • To avoid significant adverse effects between the above interrelationships • To avoid any significant adverse impacts created by the cumulative effect of the above 	<p>assessment framework.</p> <p>We also need to look at ‘in-combination with other plans’ effects, where we can. These are often referred to as ‘cumulative effects’</p>
General	Dacorum Borough Council	These generally look quite comprehensive (in the context of the Conservation Board’s remit)	Noted
General	Dacorum Borough Council	Dacorum has a general objective which may also be worth considering which is to ‘Ensure development is “climate change proof” ‘	Useful suggestion, although Man Plan not a vehicle for controlling development, as such. We shall need to ensure its policies are ‘climate change proof’
General	Luton Borough Council	Issue of access needs to be addressed or is this issue outside the scope of the Management Plan? Access is referred to in paragraph 5.14 and Policy ENV 4 ‘Access to the countryside’ in the Luton Local Plan 2001-2011, dated March 2006. Likely to be issue in other development plans that cover areas adjacent to the Chilterns AONB. Is this covered by Objective 6 – to encourage healthy lifestyles?	Access is covered under final criterion for Objective 5: To improve quality of life
Table 3	The RSPB	SEA objective 2 is shown as having an uncertain relationship with SEA objective 5. However, the wild bird indicator is one of the UK governments ‘Quality of Life’ indicators. In Table 4 it is stated ‘opportunities for people of all abilities to come into contacts with an appreciate wildlife and wild places’ is a key aspect of objective 5. What is the basis for the uncertain relationship?	Potential beneficial relationship is as the RSPB say, but there is also danger of disturbance through ill-managed access.
Table 3	The RSPB	SEA objective 2 is shown as having a positive relationship with SEA objective 7. We recommend that this is shown as an uncertain relationship. The RSPB has some concerns with some aspects of alternative energy production through the production of biofuels from energy crops. Conventional crops grown as biofuels, such as wheat and rape, have a variability in GHG savings. For example, producing biofuels from wheat offers a range of savings from conventional petrol from as high as 80% to as low as –8% (i.e. an actual increase in emissions). Dedicated energy crops, such as miscanthus and SRC, can	Accept

		potentially have a major impact on landscape and on biodiversity. If these crops are grown in unsuitable places, without mitigating habitats being created, this could conflict with conserving and enhancing farmland biodiversity.	
Table 3	The RSPB	SEA objective 2 is shown as having a positive relationship with SEA objective 10. We recommend that this is shown as an uncertain relationship. Some of the methods used to protect soils have the potential to impact on farmland biodiversity. For example, the early establishment of winter cereals means that following crops present fewer nesting opportunities for lapwings and skylarks. This can also lead to a reduction in winter stubbles, a vital winter seed source for farmland birds	Accept to a point. Proposes to show the relationship as [?/✓]
Table 3	Luton Borough Council	Suggest that objectives 3 and 6 are compatible, as an improved historic and cultural environment can encourage visitors and some exercise and fresh air is likely to be a consequential benefit.	Could be accepted – they are certainly not incompatible although the linkage is rather tenuous.
Objective 1	Environment Agency	it is not clear what the assessment criteria relating to ‘the stock of landscape features’ means	Agree - need to specify these.
Objective 2	Environment Agency	Invasive species are raised as a key issue in Table 1 but no assessment criteria is included relating to these under this or any other objective.	The issue about invasive species is that they degrade existing habitats/species and this is covered by the first two assessment criteria.
Objective 3	Dacorum Borough Council	We refer to historic and cultural ‘assets’ rather than ‘environment’ – as this term is considered to better cover the dual aspects of landscape and built structures.	Debatable – danger of overlooking the wider fabric and concentrating on particular ‘assets’?
Objective 5	Luton Borough Council	Is there scope to include benefits to visitors from outside the designated area under objectives 5 and 12? Would it be an appropriate opportunity in the preparation of the Scoping Report to address issues that concern those who live or work outside the AONB?	Accept – need to clarify. AONB is a national as well as a local resources
Objective 7	Environment Agency	This and the associated assessment criteria only covers climate change mitigation. Climate change adaptation should also be considered.	Agree – will reword this Objective and add criterion re adaptation
Objective 8	Natural England	Not sure we need 8 as well as 9 and 10; 9 and 10 could be bundled under 8. What specifically will 8 address – if not water ,	Will revise Objective in line with NE guidance to: <i>To protect material assets</i>

		soil and air ? We should be specific as to what is included as this “simple” Objective will be there in the matrix – if it is not likely to add a new and useful dimension don’t add it in.	<i>including natural resources</i> , and add a criterion relating to material assets
Objective 9	Environment Agency	This objective refers to sustainable water resource management only, however, the assessment criteria in Table 4 refer to water quality and extent and condition of wetlands and rivers. The word resource could be omitted from the objective. We suggest that other relevant assessment criteria should also be included to cover flood risk, SUDS and low flows as these are raised as key issues in Table 1.	Accept
Objective 10	Environment Agency	As mentioned in our response to question 3 above, it is not clear whether soil quality is an issue as it is not included in Table 1.	We believe it is a sustainability issue – although whether we will have the information on which to make judgements is not known
Objective 10	Dacorum Borough Council	Dacorum’s Scoping Report refers to ‘Minimise loss of valuable soils,’ which is slightly different from the ‘conserve and improve soil quality	Noted – different objectives reflect differing plan purposes.
Objective 12	Natural England	Not sure if 12 has any real status and does not seem to relate back to the SA Annex 1 or I suspect DCLG guidance. Awareness is a laudable aim but it is not an entity which can be damaged by a strategic management policy. Suggest drop 12.	Disagree – included to reflect Conservation Board duty and European Landscape Convention
Objective 12	Luton Borough Council	Is there scope to include benefits to visitors from outside the designated area under objectives 5 and 12? Would it be an appropriate opportunity in the preparation of the Scoping Report to address issues that concern those who live or work outside the AONB?	Accept – need to clarify. AONB is a national as well as a local resources
5.4.2	Environment Agency	We would suggest that the SEA Framework scoring system is amended for clarity as follows: ++ Major positive effect + Minor positive effect ? Mixed and/or uncertain effect 0 No effect and/or neutral - Minor negative effect -- Major negative effect	Not clear that this delivers a clear advantage. Prefer Natural England suggestion below.
5.4.2	Natural England	Same tone in assessment criteria – would prefer these are neutral cf leading and positive.	The expressions we have used are common practice in SA/SEA.

		<div style="border: 1px solid black; padding: 5px;"> <p>Strongly supports the SEA objective S++</p> <p>Supports the SEA objective S+</p> <p>Is neutral in effect N</p> <p>Potentially works against the SEA objective C-</p> <p>Strongly works against the SEA objective C- -</p> <p>Effects uncertain X</p> </div>	Accept
Table 4	Natural England	Assessment criteria – I would prefer these are neutral of leading and positive.	Disagree – the purpose of SEA is to assess the impact of the plan on the environment, not simply to see if it does no damage.
Table 4	Dacorum Borough Council	Dacorum’s Scoping Report didn’t have a separate column for ‘Likely Impacts Rating / Comment.’ I’m not quite sure what will be included here?	This will be where some commentary on the likely impact will be included.
6. Remaining Stages of the SEA			
6.3.1	Chepping Wycombe PC	Should it read Autumn 2008?	Production of revised consultation plan has been delayed from Autumn 2007 as originally intended, but will be available early in 2008
6.3.1	Lane End PC	There appears to be an incorrect date on page 30 at 6.3.1 "...consultation plan will be prepared in the Autumn of 2007 when ..."	See above
6.3.1	Luton Borough Council	Should the Autumn date refer to 2008, rather than 2007?	See above
Appendix 1 – Policy Context			
General	Environment Agency	The table is clearly set out with relevant indicators and targets and implications for the AONB Management Plan.	Noted
International Policy	Mr Mike Render	The international framework should include the UNCED of 1992 as well as WSSD as the former concentrated on environmental aspects of sustainability whilst the later majored on the social and developmental aspects.	Accept
National Policy	Dacorum Borough	Update reference to PPS1 supplement to clarify that it is no	Accept

	Council	longer a draft document.	
National Policy	Dacorum Borough Council	Include reference to PPS3 – as this relates to rural as well as urban housing policy. PPS3’s requirement to deliver high quality housing supports the objectives of the Management Plan (and other advice which sits below it, such as the Buildings Design Guide).	Accept
National Policy	Mr Mike Render	The national framework should include the Forestry Acts of 1967 (as amended) and 1979 which provide the legal basis for the management of the Public Forest Estate, the control of tree felling and the provision of grants in connection with the use and management of land for forestry purposes.	Accept
Regional Policy	Environment Agency	We note that the Thames Catchment Flood Management Plan (CFMP) has been used to provide baseline information and paragraph 3.2.46 notes that flood risk is generally low in the Chilterns. However, several actions are identified for undeveloped natural floodplain in the CFMP which may be relevant to the Management Plan and it is therefore suggested that this document is included in the plan and programme review.	Accept
Regional Policy	Environment Agency	It would be worth reviewing the relevant sections of the most up to date documentation for the East of England Plan and South East Plan to identify whether any changes are proposed that would alter what is set out in the draft plans	Accept
Regional Policy	Environment Agency	The review in Appendix 1 identifies that the Management Plan should help contribute to regional planning objectives but does not mention potential development pressures which could impact on the AONB.	Accept – should be identified as a key issue in Table 1 (Chapt 4)
Local Policy	Dacorum Borough Council	All of the Local Plans within the area are slowly being superseded by emerging LDF policies. These should be referred to.	As LDDs are adopted, they will provide the local planning policy context. Need to make this clearer in 3.1.4.
Local Policy	Luton Borough Council	Suggest include the following: * Core Strategy – Luton and South Bedfordshire Joint Committee	Noted – many of these will be reflected in the Joint Core Strategy DPD

		<ul style="list-style-type: none"> * Proposed and potential road schemes * Growth area DPD * Green Infrastructure Plan * Saved Bedfordshire and Luton Structure Plan policies * LDS (for ref to other planning docs) * Supplementary Planning Guidance and Documents * M1 widening programme * Check latest Airport expansion proposals * Landscape character assessment (suggest check latest with Alison Myers at Beds CC) * Draft Luton ROWIP * LAAs/Community Strategies 	LCS part of environmental baseline, not policy context
Appendix 2 – Environmental Baseline			
General	Environment Agency	<p>The summary table of baseline information for the AONB in Appendix 2 is clearly set out and we are pleased to see it includes a column on trends as this is required by the SEA Directive. However, some of the information in the table seems to appear in the wrong columns and some is missing. Quantitative trend data is not often available, it will therefore be necessary to use professional judgement to predict likely trends based on likely future changes in social, environmental and economic factors such as climate change. Targets for aspects/objectives such as pollution incidents and river water quality should be based on improving the current situation and working towards future requirements such as meeting the requirements of the Water Framework Directive i.e. achieving good ecological status.</p>	Noted – review presentation of data
General	Dacorum Borough Council	<p>The only AONB specific information we currently monitor relates to:-</p> <ul style="list-style-type: none"> (a) Dwelling completions in the AONB (number of units per monitoring year) (b) Cumulative housing completions in the AONB (from 2001/2002 onwards) (c) Non-residential completions in the AONB (per monitoring year) <p>These figures are set out in our Annual Monitoring Report (AMR). If there are additional issues / topics you need monitoring information for, we need to know this as soon as</p>	Noted

		possible. We will need to assess firstly if it is feasible to provide (bearing in mind limitations with our current monitoring systems) and secondly, what data we would need to collect and process in order to provide the information.	
General	Luton Borough Council	Check with LAA targets/national indicators (para 6.4.4 refers to a set of indicators that may be developed by Natural England)	Noted
General	Luton Borough Council	Check Annual Monitoring Reports (under Planning and Compulsory Purchase Act 2004)	Noted
Landscape	Natural England	Land Management Incentives - should refer to area in Countryside Stewardship as well as ELS/HLS	Accept
Landscape	Mr Mike Render	I question the validity of the use of the category "Woodland within the agricultural setting" as the census returns are notoriously inaccurate in this respect.	Noted
Biodiversity, Flora & Fauna	Natural England	SSSI Condition - should state Bringing into favourable or recovering condition	Accept
Biodiversity, Flora & Fauna	Luton Borough Council	Protected areas – With regard to local sites, need to check latest figures with Bedfordshire and Luton Biodiversity Recording and Monitoring Centre www.bedsbionet.org.uk . There are regular reviews leading to new sites and extensions to existing sites.	Noted
Biodiversity, Flora & Fauna	Luton Borough Council	SSSI condition - Warden and Galley Hills SSSI. In South Beds, but owned and managed by Luton BC. Part of site is declining still.	Noted
Biodiversity, Flora & Fauna	Mr Mike Render	I question the inclusion of change of use to shooting. Firstly we have no data to use for comparison and are we suggesting that such a change would be positive or negative, either could be the case	Accept
Water	Environment Agency	No data source is included for pollution incidents in the table in Appendix 2, data is available on our website at http://www.easoe.co.uk/indicators.php?f_cat_id=2&f_ind_id=12	Noted
Water	Environment Agency	The information in paragraph 3.2.49 on river water quality in the Chilterns and under the column headed key facts in the table in Appendix is very summarised. The most recent data available is for the period 2004 to 2006. The location of water quality data on our website is http://www.ea-	Noted

		soe.co.uk/indicators.php?f_cat_id=2&f_ind_id=7 .	
Water	Environment Agency	Additional entry should be made relating to compliance with Water Framework Directive (suggested text supplied)	Accept
Climate Factors	Luton Borough Council	Renewable energy – need to check latest govt targets + LAA targets and LA performance indicators	Noted
Material Assets	Luton Borough Council	Technical guidance on light pollution is available from the Institution of Lighting Engineers http://www.ile.org.uk/	Noted
Material Assets	Luton Borough Council	Previously developed land is LAA target/indicator	Noted
Material Assets	Mr Mike Render	Renewable energy: I would much rather see as an indicator the extend of heat from renewable resources rather than the electricity generation that government currently seems wedded to.	Noted – woodland management co-products potentially significant renewable heat resource