



Board Meeting

10.00 a.m. 16th October 2013

**London Gliding Club,
Tring Road Dunstable LU6 2JP**

<http://www.londonglidingclub.co.uk/location.xml>

Agenda

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| 1. | Apologies | 10.00 |
| 2. | Declarations of Interest | 10.01 |
| 3. | Minutes of Previous Meeting | 10.02 - 10.07 |
| 4. | Matters Arising | 10.07 - 10.10 |
| 5. | Public Question Time | 10.10 - 10.13 |
| 6. | Changes to Board Membership | 10.13 - 10.16 |
| 7. | Report from the Executive Committee | 10.16 - 10.26 |
| 8. | Report from the Planning Committee | 10.26 - 10.36 |
| 9. | Annual Audit Return | 10.36 - 10.46 |
| 10. | Report on AONB Management Plan Review | 10.46 - 11.00 |
| 11. | Position Statement on Renewable Energy | 11.00 - 11.30 |
| 12. | Report on DEFRA consultation
on Biodiversity off setting | 11.30 - 11.50 |
| 13. | Report on High Speed 2 | 11.50 - 12.10 |
| 14. | Future of the Chilterns LEADER Programme | 12.10 - 12.35 |
| 15. | The Landscape Declaration | 12.35 - 12.45 |
| 16. | Report on Attendance at Events | 12.45 – 1.00 |
| 17. | Dates of Future Meetings | |

Item 6 **Changes to Membership of the Board**

Author: Steve Rodrick Chief Officer

Summary: Cllr Bill Bendyshe-Brown has been appointed to the Board by Bucks to replace Richard Pushman.

Cllr Roger Metcalfe has been appointed by Wycombe DC following the death of Roger Emmett in June.

On 4th November DEFRA will advertise the three Secretary of State vacancies to be filled by March 2014.

Purpose of Report To notify members of changes to membership; and to request that members encourage potentially suitable candidates to apply for the three Secretary of State vacancies.

Local Authority Members

1. Richard Pushman did not stand for re-election to Bucks CC in May 2013. Bucks has recently appointed Cllr Bill Bendyshe- Brown as his successor. Bill was first elected to the county council in May this year to represent The Risboroughs. He lives in Skittle Green near Bledlow. He has been a member of Wycombe DC and the town council of Princes Risborough for a number of years. He is a retired RAF officer.
2. Following the death of Roger Emmett in June, Wycombe DC has just appointed Cllr Roger Metcalfe, who replaces Roger Emmet as the member for the Hambleton Valley.

Secretary of State Members

3. Three members (Mike Fox, Bettina Kirkham and John Willson) appointed by the Secretary of State will have to stand down on 31st March 2013 when they complete their third term having been re-appointed twice, the maximum allowed.
4. DEFRA has indicated that vacancies will be advertised on 4th of November, probably for a period of 4 or possibly 6 weeks. Their capacity to promote the vacancies is limited. It is important that there is a good selection of candidates and the Board needs to promote the vacancies widely. It is helpful if members personally encourage any potentially suitable candidates to apply. Interviews will be held next February following an initial sift in January.

Recommendations

- 1. To note, and welcome, the appointment by Bucks CC and Wycombe DC of new members to the Board.**
- 2. To note and help promote the forthcoming Secretary of State vacancies.**

Item 7 **Report from the Executive Committee**

Author: Steve Rodrick Chief Officer

Summary: At its meeting on 19th Sept 2013 the Executive Committee:

1. Received and approved the finance report for the period April – July 2013.
2. Discussed a report on the medium financial forecast for 2014-16. A special finance sub group was created to consider options to tackle the forecast operating deficit.
3. Received and approved a report on the Treasury Management.
4. Reviewed and approved the Risk Register.
5. Received a report on the satisfactory progress in reviewing the AONB Management Plan 2014-19.
6. Received and discussed a report on HS2.
7. Discussed a proposal to brand and promote a Skills, Learning and Fun programme.

Purpose of Report To advise Board members of the matters considered and decisions taken, by the Executive Committee under delegated powers.

Finance Report April –July 2013

1. The Committee received and discussed the report from the Finance Officer. The current position was very close to that forecast (expenditure was marginally below profile and income marginally ahead) and there were no major issues arising.

Medium Term Financial Forecast 2014-16

2. The current medium term forecast covers the period 2010-2015, which shows a likely operating deficit in the order of £30-40,000. It was felt that given the uncertainty over the next few years the medium term forecast should be extend to 2016 but no further for the time-being. Based on the current trends

in government and local authority support there could be an operating deficit of up to £50,000 in 2014-15 and £100,000 in 2015-16.

3. The Executive Committee decided to set up a sub-committee to consider strategic options and report to the Executive Committee on 12th December 2013 and the full Board on 22nd January 2014.
4. Terms of reference agreed were:
 1. Identify the implications of the progressive reduction in income on:
 - I. Delivering the Board's statutory purpose
 - II. Delivering the Board's policies.
 2. Conduct a review of detailed options including, but not limited to:
 - I. Reducing core operating and on-going activity costs
 - II. Generating additional income to meet operating costs.
 - III. Increasing earned income from Treasury Management
 - IV. Using reserves to increase capacity to generate additional income.
 3. Develop a strategy for using reserves in the medium term

Treasury Management Report

5. The Committee received the report from the Finance Officer. It was noted that income from Treasury Management in 2013 was £9,616, higher than the original forecast of £7,225, but still only a rate of return of 1.29%. No change to the Treasury Management Strategy was proposed.

Review of the Risk Register

6. The Committee reviewed the risk register, which it does every 6 months. The only risk which remains high, and of concern, is the uncertainty over future funding from government and local authorities. The creation of a sub group to look in detail at strategic options is a specific response to this risk.

Review of the AONB Management Plan

7. The Committee received an update on the progress of reviewing and publishing the AONB Management Plan for 2014-19. The policy amendments requested by Board members had been incorporated and the revised plan was ready to be published for public consultation on 27th Sept (now achieved) for a period of 12 weeks to 20th December. The scoping report for the Strategic Environmental Assessment had been published. Thirty responses had been received and all comments considered. No significant revisions were deemed necessary.

Report on High Speed 2

8. The committee discussed a report HS2 and, in particular, the need to petition Parliament for a full length bored tunnel under the Chilterns (it may include an intervention facility so would not be a complete bored tunnel but it would be much longer than the bored tunnel currently only proposed from the M25 to Mantles wood near Hyde Heath).
9. The Committee thanked Ray Payne for this work with Peter Brett Associates consulting engineers, in preparing a report on the benefits of a longer bored tunnel.

Chiltern Skills, Learning and Fun Programme

10. The Chief Officer explained that an opportunity exists to generate additional income from the Board's events programme if it was to be better co-ordinated and branded. The staff are currently working on ideas with a view to the new programme being launched in early 2014. A specific aim will be to generate income as a contribution to the Board's operating costs. An upper target would be in the order of £10,000 per annum.

N.B. this is only a working title.

Recommendations

1. **To note the matters discussed by the Executive Committee and the decision made under delegated authority.**

Item 8 **Report from the Planning Committee**

Author: Colin White - Planning Officer

Summary: The Planning Committee met on 5th September.
The following items were discussed:

1. Election of Chairman
2. High Speed 2 update
3. AONB Management Plan Review
4. Events
5. Planning Policy Guidance
6. Solar Farms
7. Development Plans responses
8. Planning applications update

Purpose of Report: To inform of the Board of the items considered by the Planning Committee.

Election of Chairman

1. The Committee appointed Bettina Kirkham as Chairman.

High Speed 2 update

2. The Committee was informed about: the meetings held that had involved input from the Board; the submission of the Board's response on the Draft Environmental Statement; the submission by HS2 Action Alliance of its case to the Supreme Court; the continued press coverage; the review of the "Buckinghamshire Blueprint" for mitigating HS2; the Community Forums starting again in September; work on producing a document that will try and deal with the non-market effects of the construction of HS2, and the meetings of the Wider Chilterns HS2 Group.
3. The Committee resolved to advise the Board to seek the help of a local MP in requesting information about spoil (quantity and possible routes and destinations for disposal) and for the Board to discuss the issue of spoil disposal at a future meeting.

AONB Management Plan Review

4. The Committee considered the responses to the Draft SEA Scoping Report and that concluded that no substantive changes were needed. The Committee considered the work done on the draft Management Plan.

Events

5. Feedback was given from the most recent Planning Forum where the first year of the NPPF and the AONB Management Plan were discussed. The last Forum was well attended. A report was given on the recent Design Awards ceremony and a discussion took place about possible changes. The recent Planning Committee tour to the area east of Luton was also discussed and it was felt that the area would be worthy of consideration as part of a possible AONB boundary review.

Planning Policy Guidance

6. The Committee was presented with a draft document dealing with renewable energy. It was agreed that various changes should be made and these have been incorporated into the version attached. The Board is asked to approve the draft Renewable Energy Position Statement for circulation.

Solar Farms – pre-application proposals

7. The Committee was informed about two recent proposals for solar farms (Bledlow and west of Hemel Hempstead). Though both are outside the AONB they are likely to have impacts on the AONB. It was resolved that a sub-group of the Committee be formed to assess proposals for solar farms. The sub-group will also undertake site visits and will include the following Board members – Bettina Kirkham, Barbara Wallis, Brian Norman and Alan Walters.

Development Plans responses

South Oxfordshire District Council's Proposed SA of Scoping Report for Local Plan Sites and General Policies

8. The Board suggested that the Scoping Report should refer to both the National Parks and Access to the Countryside Act 1949 and the Countryside and Rights of Way Act 2000 as both are relevant. Other inconsistencies were also pointed out.

Chiltern District Council's Delivery Development Plan Document public participation

9. The Board objected to the removal of various settlements from the Green Belt and noted that some site descriptions failed to take account of the fact that they are within or adjacent to the AONB. Objection was made to the inference that a traveller site could possibly be located off Springfield Road in Chesham. The Board welcomed the proposed preparation of a Heritage Strategy. The Board considered that a more proactive approach should be taken to the active enhancement of the wider environment and reference could be made to the Buildings Design Guide and technical notes. The Board considered that the Gypsy, Traveller and Travelling Showpeople site selection criteria

should include the need to seek sites outside the AONB at Stage One (broad criteria) rather than Stage Two (detailed criteria).

Woodcote Parish Council's Woodcote Neighbourhood Plan 2013-2027

10. The Board welcomed the prominence given to the AONB though suggested that it would be appropriate to mention it and the Design Guide and technical notes elsewhere. All housing sites should seek to meet the AONB's purpose.

Aylesbury Vale District Council's Vale of Aylesbury Plan Strategy Proposed Submission

11. The Board suggested that the AONB should be recognised as part of the natural and built environment and that its protection is a key issue at a 'larger than local' scale. Some changes were suggested to ensure consistency with the National Parks and Access to the Countryside Act 1949, the Countryside and Rights of Way Act 2000 and the NPPF. The Board expressed concern about the possible impacts arising from development (albeit outside the AONB). The Board considered that greater emphasis should be given local distinctiveness and reference should be made to the Design Guide and technical notes.

Central Bedfordshire Council's Gypsy and Traveller Local Plan

12. The Board objected to the lack of mention of the need to take account of landscape impacts. The Board also objected to proposed sites at west of Barton le Clay and south of Dunstable and requested that full LV IAs be prepared, whilst suggesting that the Dunstable site should be removed from the Plan as it failed to meet the purpose of the AONB.

North Hertfordshire District Council's Housing additional location options

13. The Board commented that several of the additional sites are within the setting of the AONB and full consideration should be given to the impacts on the AONB should they be taken forward. All sites commented on were considered to be within sensitive landscapes and full LV IAs should be undertaken. Any future boundary review should be taken account of for the area generally to the south of the A505.

South Oxfordshire District Council's consultation on Sites and General Policies

14. The Board expressed surprise at the lack of detail as no indication was given about where the 1,154 dwellings and 4.2ha of employment land are likely to be actually allocated in villages. The local plan should include full testing in landscape terms for each site. The Board is not convinced that any of the settlements in the AONB will be capable of taking the level of development identified without there being significant detrimental impacts on the AONB. The Board pointed out that in some instances a lack of services and facilities would lead to some settlements being less sustainable. The document lacked detail about what general policies are likely to be included, though mention was made of safeguarding the natural and historic environment.

Wycombe District Council's Local Plan Sustainability Appraisal Draft Scoping Report

15. The Board suggested that the Chilterns HLC should be added to the list of documents to consider. Suggestions were made for changes to properly reflect the legislation and policy applicable to AONBs.

Further details of the development plans responses and all other papers can be viewed at the following: [link](#)

Planning applications update

16. The Committee was informed about the various responses that had been made and approval was given for these. The updates to various cases were noted. The Committee noted that for 2013/14 the number of cases decided in line with the Board's comments was 55%.

Recommendations

1. **The Board notes the report from the Planning Committee.**
2. **The Board approves the draft Renewable Energy position statement for circulation.**

Item 9 Annual Audit Return

Author: Chris Smith Finance Officer

Summary: The Audit Commission have completed their audit of the Board's accounts for 2012-13 and have drawn to the attention of the Board four matters arising.

Purpose of the Report: To inform members of the completion of the external audit for 2012-13.

Background:

- 1 The Board is responsible for ensuring that its financial management is adequate and effective and that it has a sound system of internal control.
- 2 The Board prepares an annual return in accordance with proper practices which:
 - Summarises the accounting records for the year ended 31 March 2013; and,
 - Confirms and provides assurance on those matters that are important to the auditor's responsibilities.
- 3 The auditor appointed by the Audit Commission, BDO, is required to conduct an audit and, on the basis of the review of the annual return and supporting information, to report whether any matters give cause for concern that relevant legislation and regulatory requirements have not been met.

Audit Conclusion:

- 4 On the basis of their review, in the opinion of the auditor the information in the annual return is in accordance with proper practices and no matters have come to their attention giving cause for concern that relevant legislation and regulatory requirements have not been met.
- 5 The auditor has drawn two matters to the attention of the Board. These are detailed in the "Issues Arising Report" attached.

Responses and Action:

- 6 The following responses are offered to the issues raised:
 - (i) Previous internal audits have consistently confirmed that systems and procedures at the Board are sound, and a lighter touch was recommended by the internal auditor as a

result. The Finance Officer will discuss this issue with the internal audit ahead of next year's audit.

- (ii) The change to the Board's insurers resulted in a significantly lower premium but a reduced amount of cover for fidelity guarantee. This was discussed with the insurer who indicated that any increase, which would be subject to an additional premium, would still not cover the entire risk. A report will be presented to a future Executive Committee setting out the arguments for and against increasing the cover.

Recommendation:

- 1. To approve and accept the audited annual return and issues arising report for 2012-13 and agree to the responses and action set out above.**



**ISSUES ARISING REPORT FOR
Chilterns Conservation Board
Audit for the year ended 31 March 2013**



Introduction

The following matters have been raised to draw items to the attention of Chilterns Conservation Board. These matters came to the attention of BDO LLP during the audit of the annual return for the year ended 31 March 2013.

The audit of the annual return may not disclose all shortcomings of the systems as some matters may not have come to the attention of the auditor. For this reason, the matters raised may not be the only ones that exist.

The matters listed below are explained in further detail on the page(s) that follow;

- Internal Audit Checks
- Fidelity Guarantee

The following issue(s) have been raised to assist the body in improving its internal controls or working practices. The body is recommended to consider these but is under no statutory obligation to act upon them.

Internal Audit Checks

What is the issue?

The Internal Auditor has entered 'Not Covered' to the following test(s) on Section 4 which we consider relevant to the body. The Internal Auditor has not stated, or noted as required on Section 4 of the Annual Return, when the most recent internal audit work was undertaken and when it is next planned in respect of these test(s), or, if coverage is not required, explained why not.

The body's financial regulations have been met, payments were supported by invoices, expenditure was approved and VAT was appropriately accounted for.

Expected income was fully received, based on correct prices, properly recorded and promptly banked; and VAT was appropriately accounted for.

Petty cash payments were properly supported by receipts, expenditure was approved and VAT appropriately accounted for.

Asset and investment registers were complete and accurate and properly maintained.

Why has this issue been raised?

Failure to undertake these tests result in an incomplete internal audit being undertaken and the body could be exposed to risks in these areas.

What do we recommend you do?

The above tests should be carried out in future years by the Internal Auditor. The body should ensure he/she provides a full report to the body to ensure all the activities are properly carried out and recorded.

Further guidance on this matter can be obtained from the following source(s):

Governance and Accountability in Local Councils in England - A Practitioners Guide, NALC/SLCC

The following issue(s) have been raised to assist the body. The body is recommended to take action on the following issue(s) to ensure that the body acts within its statutory and regulatory framework.

Fidelity Guarantee

What is the issue?

The body has fidelity guarantee cover, however this appears to be insufficient in light of the bank balances held at 31 March 2013 and the amount of levy then subsequently received in April 2013.

Why has this issue been raised?

A body, under S114 of the Local Government Act 1972, must take security as it considers sufficient in the case of any of its officers likely to handle its money. The body may decide that insurance is not 'sufficient' for them, but in order to come to this opinion it must have reviewed the requirement annually and have objective grounds for such a conclusion.

What do we recommend you do?

The body should consider the level of insurance cover and set it to a level that will protect the body against potential loss. The body should review the level of cover at least annually as circumstances may change throughout the year.

The amount should be sufficient to cover the maximum amount of money the body holds at any one time during the year. A body does not have to have fidelity guarantee insurance if it considers that no security is 'sufficient' but there must be objective grounds for such a conclusion. Smaller bodies may decide therefore that the cost of this insurance is disproportionate to the risk involved. If this is so the body should minute this decision annually.

Further guidance on this matter can be obtained from the following source(s):

Local Council Administration, 8th Edition, Charles Arnold-Baker, Chapter 9.8
Governance and Accountability in Local Councils in England - A Practitioners Guide, NALC/SLCC

No other matters came to our attention.

For and on behalf of
BDO LLP

Date: 23 September 2013

- Respondents were asked to rate the importance of 15 different areas of work corresponding to the main themes of the Management Plan, from 1 (very important) to 5 (unimportant).
- 'Protect and enhance wildlife' received the strongest support with 77% giving it a no. 1 rating. The next most supported areas were 'maintain the tranquillity of the countryside' (74%) and 'make sure new building is in the right place and well-designed' (70%).
- Few respondents (generally less than 10) were prepared to rate any area as unimportant. However, providing and improving access, providing visitor facilities and supporting tourism were clearly less popular than conservation and heritage work, receiving a no.1 rating (very important) from 10-31% of respondents.

Cost

4. The total cost of publishing and consulting on the draft plan is estimated to be £3,000. The cost has been significantly reduced by limiting the number of printed copies. So far all the technical work and drafting has been undertaken in-house and no use has been made of consultants.

Strategic Environment Assessment (SEA)

5. The Scoping Report for the accompanying Strategic Environment Assessment has already been published. Thirty responses were received with approx. 100 comments, none of which required a significant amendment. The comments and proposed response are listed in Appendix 1. This appendix is only being circulated in electronic form.

Recommendations

1. **To note that the review of the AONB Management Plan is proceeding according to the programme.**
2. **To approve the proposed response to the comments submitted on the scoping report for the Strategic Environmental Assessment**

Table Detailing Comments and Responses Made on Chilterns AONB Management Plan 2014-19 Draft SEA Scoping Report and Project Plan

Name	Section or para	Page	Comments	Response
Aylesbury Vale District Council	General		The structure of the Scoping Report and identified SA Objectives appear to cover the likely content of the reviewed Management Plan.	Noted.
Bradenham Parish Council	General		Bradenham Parish Council has no comments to make.	Noted.
Chesham Town Council	General		Chesham Town Council has no comments to make.	Noted.
Chiltern District Council	General		Having looked through the document and its associated Project Plan I am happy to state that there are no issues of concern for this council. Therefore Chiltern District Council has no substantial observations to make on the document.	Welcomed and noted.
Dacorum Borough Council	General		Thank you for consulting Dacorum on the Draft SEA Scoping Report and Draft Work Plan for the AONB Management Plan. I can confirm that Dacorum has no comments on either document.	Welcomed and noted.
Downley Parish Council	General		Downley Parish Council has no specific comments to make.	Noted.
Environment Agency, Hatfield	General		Thank you for consulting us with this SEA Scoping Report. Overall, we support the objectives set out in the report. We feel that the 'Water' section could be altered slightly, as set out in the comments below, to provide further details of groundwater resources in particular.	Welcomed and noted.
Hambleton Parish Council	General		Hambleton Parish Council has no comments to make.	Noted.
Harlington Parish	General		Harlington Parish Council has no comments	Welcomed and noted.

Council			to make and feels the report is acceptable as it is.	
Hertfordshire County Council	General		The report is thorough and seems to address most of the issues. We could not identify any additional substantive policies, plans, programmes or regulations that should be included.	Welcomed and noted.
Hertfordshire County Council	General		With regard to data, much of HCC's information/data sets are held at a County level but may be easily distilled down to a district and parish basis – these sets have been held for a period of time and as such are likely to have been made available in the past. Hertfordshire has also created a series of Green Infrastructure Plans at District level with GIS mapping, that may be applicable but may not have been replicated within other county areas.	Noted and will contact Hertfordshire County Council should data be needed.
Ibstone Parish Council	General		Ibstone Parish Council has no comments to make.	Noted.
Luton Borough Council	General		Luton Borough Council has no comments to make.	Noted.
Milton Keynes Council	General		Milton Keynes Council has no comments to make.	Noted.
Natural England	General		Natural England is content overall with the approach and content of the Draft Report. We have no significant comments to make at this stage on the documents attached as Appendices except to say that they are well written and comprehensive.	Welcomed and noted.
NFU	General		I have read through the SEA scoping report consultation and have nothing to add or change regarding the agricultural content. I think that the pressures on farming, and the consequent effects on the AONB, are well expressed.	Welcomed and noted.

National Trust, London and South East Region	General		On behalf of the National Trust, London and South East Region I am very pleased to express support for the structure, background rationale and appraisal of issues in the draft scoping report. The iteration of environmental assessment methods in this report is extremely thorough and comprehensive in its approach. The process adopted is an exemplary application of the approach in EU 2001/42/EC and the context of issues set out at page 11 - 14 comprehensive and well informed. The proposed SEA objectives at Table 2 is itself wholly appropriate for the Chilterns AONB and is reinforced by a very impressive compatibility matrix at Table 3 and summary of assessment criteria at Table 4. Appendix 1 provides a very comprehensive summary of international and national policy and this is applied to the Management Plan SEA in a way that links to the specific environmental factors that affect the Chilterns. The National Trust is very happy to express support for this document and the methodology as contained within it.	Welcomed and noted.
Radnage Parish Council	General		Radnage Parish Council has no comments to make.	Noted.
Richard Hagen, Toddington	General		Due to likely development pressures and in order to provide increased access and protection for the rural area, suggests a proposal to extend the AONB boundary from Sundon and Harlington to Dunstable Downs via Toddington, Wingfield, Hockliffe and Totternhoe to the west of Dunstable.	Comments and suggested boundary change are noted. Comments will be forwarded to Natural England as this is the body that designates and revises the AONB boundary.
Sonning Common Parish Council	General		By the nature of LPAs Core Strategies and new Local Plans, there will need to be some	Comments and suggested boundary change are noted. Comments will be forwarded to

		<p>development of AONB land. In cases where this is so it may be appropriate to take into AONB designation compensating areas which were not previously classified as AONB but which are attractive and appropriate to defend potential major risks to the AONB area overall. In that context I would raise the area of land to the South of Sonning Common, south of Kennylands Road. This area running up to the woodland line of Bur Wood and Rudgings Plantation etc is attractive and represents the frontline of risks of overspill development from Emmer Green and Reading – such trends would be a major threat to the whole AONB area. Such trends could emerge from the major regeneration planned for the whole of northern Reading (initially just to the south of the River Thames) the massive upgrade to the capacity of the (First) Great Western railway lines, the doubling of the capacity of Reading Station, the immense “Station Hill” development project which is approved in principle with Shops, Offices and homes (apartments) and other sweeping regeneration projects planned by Reading. These developments are likely to move the centre of gravity of Reading northwards and generate irresistible pressure for a new 3rd bridge over the Thames and linking into the A329(M). All of this will create longer-term pressure for more overspill development likely to impact the core AONB area. Whilst acknowledging that Reading will develop, it would seem a good idea to consider the risks and to designate some new AONB land to refresh the overall stock? It</p>	<p>Natural England as this is the body that designates and revises the AONB boundary.</p>
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			seems to me that this would be an appropriate Strategic Environment response to the development pressures and an appropriate consideration for the Strategic Environmental Assessment Scoping Report underway?	
South Bucks District Council	General		South Bucks District Council has no comments to make.	Noted.
South Oxfordshire District Council	General		South Oxfordshire District Council has no comments to make.	Noted.
Stokenchurch Parish Council	General		Stokenchurch Parish Council has no comments to make.	Noted.
Tring Town Council	General		This is a very thorough report on the process of establishing the aims and objectives of safeguarding the Chilterns AONB. We certainly want to keep the special qualities of this area. I believe you have covered every aspect.	Welcomed and noted.
Turville Parish Council	General		Turville Parish Council has no comments to make.	Noted.
Wendover Parish Council	General		Wendover Parish Council wishes to congratulate the Chilterns Conservation Board on the production of both a comprehensive and professional assessment of the nature and scope of the work to be undertaken.	Welcomed and noted.
West Wycombe Parish Council	General		West Wycombe Parish Council has no comments to make.	Noted.
Wigginton Parish Council	General		Wigginton Parish Council has no comments to make.	Noted.
Woodcote Parish Council	General		Woodcote Parish Council has no comments to make.	Noted.
Wycombe District Council	General		Wycombe District Council has no comments to make.	Noted.
Bettina Kirkham	1.2.1	3	Last sentence – is it worth slightly rephrasing	Comment noted – the sentence includes text

			this sentence if other scenically attractive areas are looked at as part of any boundary review?	which deals with the AONB as designated at present. As this is not likely to change it is not considered necessary to change the text in this instance.
Bettina Kirkham	1.2.3	4	Last bullet point – suggest deleting ‘of’ and replacing with ‘including’ after ‘historic environment’.	Agree – the description is not all inclusive and the change would ensure this is reflected in the text.
Hertfordshire County Council	2.2.4	9	Your list of consultees does not include the British Horse Society or the Cycle Touring Club, both of which, I’m sure, would have an interest in the plan.	Agree – will add British Horse Society and the Cyclists’ Touring Club to those consulted in future.
Sheila Pilkington, Markyate	2.2.4	9	I was surprised to see that the Canal & River Trust are omitted, could also include Friends of Tring Reservoirs and Wendover Arm Trust. I personally think there should be more consideration given to elected bodies views, where they are there to represent local people. Other bodies like CPRE are self appointed and often have many self-interested supporters, yet appear to have at least as much influence as others who are elected and subject to scrutiny of interest.	Partially agree – will add Canal and River Trust to those consulted in future. Other organisations are much more local in nature and should pick information up from wider publicity. Other comments noted.
Henley Town Council	3.1.1	11	It is acknowledged in the text that " <i>Activity in the Chilterns is influenced by a very wide range of laws, regulations, policies, priorities and funding programmes emanating from many different bodies operating at European, national, regional and local levels and directed at a range of environmental, social and economic objectives. The challenge for the Management Plan is to bring cohesion to these influences, to resolve any conflicts where possible and optimise their collective outcome for the AONB, including adding the value of the Conservation Board’s contribution.</i> " The text goes on to describe	The comments are noted. It is not considered necessary to acknowledge and describe a process that should be adopted for resolving differences of opinion as these would have been considered by the Conservation Board and should have been resolved prior to adoption of the final version of the Management Plan.

			very effectively the process for analysing the relationship between the AONB Management Plan and other policy documents, but stops short of explaining the process for resolving differences of opinion. It would be helpful to acknowledge the need for, and to describe, the process adopted for resolving differences.	
Environment Agency, Hatfield		12	Page 12 – <i>Biodiversity, fauna, flora</i> box: The Water Framework Directive (WFD) should also be mentioned in this box. We note that it is included in the ‘water’ box, but it is also relevant to biodiversity, as one of the key principles of the WFD is to improve ecological status.	Agree – will add reference to the Water Framework Directive in this section as it is considered relevant here.
English Heritage	3.1.5	13	One of the “key messages” for cultural heritage in the table following paragraph 3.1.5 is that “The Management Plan should include objectives for the conservation of these sites and features”. We suggest that the Management Plan should go further than simply including objectives – it should include measures or policies for the conservation and enhancement of the historic environment of the AONB and the heritage assets therein.	Agree – will change the text to read as follows (having deleted ‘objectives for the conservation of these sites and features’): ‘measures or policies for the conservation and enhancement of the historic environment and heritage assets of the AONB’.
Environment Agency, Hatfield		13	Pages 13/14 – Water box: This should also reference the Thames Catchment Flood Management Plan, and relevant CAMS documents. These are identified in Appendix 1, but have not been referenced here.	Agree – add ‘including those for the Colne, Thame and South Chilterns and Thames Corridor’.
Central Bedfordshire Council	Landscape	15	The adjoining land to the AONB tends to be subject to great pressure for development or change of use, which can have a major impact on the AONB itself. The Local Character Assessments: the South Bedfordshire LCA, the Mid Bedfordshire LCA	Comments noted and issue will be addressed within the Management Plan itself.

			and the Chalk Arc LCA provide more detail on the Luton and Dunstable urban fringe.	
Central Bedfordshire Council	Landscape	15	There may be a need to examine the impact of Renewable Energy and its impact on AONB setting.	Comments noted and issue of development affecting the setting of the AONB will be addressed within the Management Plan itself.
Sheila Pilkington, Markyate	3.2.8	15	The area round Markyate suffers in this boundary issue in so far as developments and changes of use are occurring on the fringes of counties, boroughs and parishes which impinge more on the AONB than the residents of the individual communities. I believe the local situation is well appreciated, but would wish to endorse concerns.	Comments noted and issue of development affecting the setting of the AONB will be addressed within the Management Plan itself.
Bettina Kirkham	3.2.14	15	Last sentence – is this a reference to the National Character Area?	No, the reference is to the Countryside Commission Landscape Assessment.
Central Bedfordshire Council	Biodiversity, flora and fauna	17	Tree diseases and woodland resilience to climate change requires more emphasis. Impacts of climate change on spread of non-native species; changes in pest and diseases control should be considered in the environmental assessment of the review of the Management Plan.	Pests, diseases and woodland resilience to climate change are all recognised in the scoping report as key issues and will therefore be addressed in the Environment Report as well as the Management Plan.
RSPB	3.2.23	17	Section 3.2.23 states that “The Chilterns AONB is of national importance for some farmland bird species, notably corn bunting, linnet, skylark and yellowhammer”. For other points in this section (3.2) you have referenced the date of the dataset. I feel it would be useful to do this here too i.e.: “A 2002 surveys showed that the Chilterns AONB is of national importance ...”	Agree – amend first part of the sentence to read: ‘A 2002 survey showed that the Chilterns AONB is of national importance for ...’.
Sheila Pilkington, Markyate	3.2.23	17	The waterways and reservoirs and their reed beds (at Tring at least) are also homes to important rarities. The fish could do with a mention if only as an essential food source.	Comments noted though no change is proposed. To include all species and habitats would be too onerous for both the Scoping Report and the Management Plan. They would all, however, be covered by appropriate

				policies in the Management Plan.
Central Bedfordshire Council	Material assets	18	Increasing non-food crops – consider whether there is increase in bio-fuel production and what impact it may have for the AONB.	Comments noted, matter will be addressed as part of text of Management Plan itself.
Central Bedfordshire Council	Material assets	18	Woodland management – consider woodland management for biomass production.	Comments noted, matter will be addressed as part of text of Management Plan itself.
Central Bedfordshire Council	Material assets	18	Tranquillity – consider impacts of increased recreational use arising from new development on the audio and visual tranquillity in the AONB.	Comments noted, matter will be addressed as part of text of Management Plan itself.
Chiltern District Council	3.2.36	19	This refers to chalk being supplied by pipeline to Warwickshire and Pitstone. I thought Pitstone had closed or was this just the quarry element and the cement manufacturing is still going on?	The text refers to the supply of chalk by pipeline from Kensworth. The reference to Pitstone is as a working quarry, albeit at a reduced scale. No change is necessary.
Hertfordshire County Council	3.2.37	19	With regard to waste, there appears to be nothing in the report that would concern us and we'd support the proposal to promote the use of wood as a renewable fuel. One potential error - in para 3.2.37, the report suggests that the 43% recycling figure for England represents the 'highest' performers. Should this be 'average' because the report goes on to talk about some authorities reaching almost 70%?	Agree that text may seem to be confusing, therefore suggest adding 'average' before 'rate of recycling' in line 3.
Sheila Pilkington, Markyate	3.2.40	19	I think Markyate PC would endorse these concerns. Our conservation area has many properties to which we have no right of access, but which do raise concerns locally. We have been very concerned about the walls of Cell Park (listed in its own right), which DBC has had protracted efforts to get repaired, still with no success.	Comments noted.
English Heritage	3.2.40	19	Although there is a currently a lack of data on the condition of Grade II listed buildings and	Agree with comment, therefore suggest adding 'in connection with Grade I and II* listed

			non-designated heritage assets there is data on the Heritage at Risk register for Grade I and II* listed buildings, scheduled monuments and conservation areas at risk which should be included to give an indication of the state of the most significant designated assets in the AONB.	buildings, scheduled monuments and conservation areas at risk' after 'information in line 2 on page 20.
Central Bedfordshire Council	3.2.43	20	The Strategic Environmental Assessment and the Management Plan should take into account findings of the national Climate Change Risk Assessment published in January 2013.	Agree with comment, add reference to national Climate Change Risk Assessment published in January 2013 to Appendix 1 and assess the implications for the Management Plan.
Central Bedfordshire Council	Climatic factors	20	Sustainable construction – consider whether there is increased demand for construction timber and biomass.	Comments noted, matter will be addressed as part of text of Management Plan itself.
Central Bedfordshire Council	Climatic factors	20	Climate change resilience – consider how the Management Plan can increase the AONB's resilience to climate change.	Comments noted, matter will be addressed as part of text of Management Plan itself.
English Heritage	3.2.42	20	This paragraph of the report should include more baseline information about the historic environment of the AONB and the heritage assets therein than just the number of registered Historic Parks and Gardens. How many listed buildings (Grades I, II* and II), Scheduled Monuments and Conservation Areas are there? Are there historic routeways, farmsteads, other landscape features (hedgebanks, ancient woodlands etc), towns and villages? How significant are these assets? What is the spatial distribution of these assets?	Agree with comment, therefore suggest adding the following at the end of 3.2.42: 'In addition to the Historic Parks and Gardens there are: 2,149 listed building of Grades I, II* and II; 113 Scheduled Monuments and 94 Conservation Areas. There are also numerous other heritage assets spread throughout the AONB including routeways, farmsteads, landscape features, small towns and villages all of which make an important contribution to the character of the area. More information can be obtained by interrogating the annual State of the Chilterns Environment reports and the Chilterns Historic Landscape Characterisation Project.' These issues will also be detailed in the Management Plan as drafted.
Environment Agency, Hatfield		20	Page 20 – Soil: This should be expanded to include geology and hydrogeology, as these	Agree with the thrust of the comments and suggested changes. No change is needed in

			<p>characteristics have a large impact on the nature of the AONB area, and influence the soils. We feel that this should be re-titled “<i>soils, geology and hydrogeology</i>” and include a paragraph providing details about the underlying geologies that make up the AONB, how these affect the character of the AONB, and what issues can result from this geology e.g. high permeability of the chalk allowing the relatively free movement of pollutants into groundwater resources. Geological maps are available from the British Geological Survey.</p>	<p>connection with additions for geology (other than as described below) and the influence of these on soils and character of the AONB as these are considered to be adequately covered in paragraph 3.2.44, the landscape character assessment work that has previously been undertaken and will be addressed in the Management Plan as well as other advice that the Board publishes. Therefore change title of the section to ‘Soil, geology and hydrogeology’ and add the following as a new paragraph: ‘The bedrock underlying the Chilterns is chalk, principally comprising Upper, Middle and Lower Chalk beds, and this highly permeable rock allows relatively free movement of water (and therefore water-borne pollutants) into valuable groundwater resources.’</p>
Environment Agency, Hatfield	3.2.46	21	<p>You identify areas at risk of groundwater and/or surface water flooding as areas of potential concern. However, this is not carried forward into <i>Appendix 2</i> (environmental baseline), which is where we would expect to see additional details. You will need to consider whether the Local Authority planning policies for those areas affected by such flooding are sufficiently strong to protect developments and occupiers from the effects of flooding, whilst still maintaining the character of the AONB.</p>	<p>Agree with comments, therefore add the following to read:</p> <ul style="list-style-type: none"> • ‘Groundwater and surface water flood risk’ in the Aspects/Objectives column on page 14 of Appendix 2; • ‘Through Strategic Flood Risk Management Plans and Local Plans’ in the Indicators column on page 14 of Appendix 2; • ‘Groundwater and surface water flood risk in some valley settlements (e.g. Hambleden)’ in the Targets and Issues column on page 14 of Appendix 2, and • ‘Flooding data should emerge through Strategic Flood Risk Management Plans and Local Plans prepared by local authorities and which will be assessed for compliance with the

				purpose of the AONB' in the Data Sources/Comments on data column on page 14 of Appendix 2.
Sheila Pilkington, Markyate	3.2.46	21	We believe that the new development at Manor Farm will seriously put ours and a number of properties nearby at increased risk of groundwater and surface water flooding. I am not convinced that the planning inspector at the appeal listened adequately to these concerns.	Comments noted.
Sheila Pilkington, Markyate	3.2.47	21	The Parish Council has been raising this problem over the last year. While water consumption needs to be reduced, Affinity Water only plans more extraction to meet any shortfalls. There is so much new development being planned that the demand will be even higher, but other solutions for Affinity are not so economic. Their shareholders are not mainly UK based, so will not have the concerns that are held in the UK. Reading on this section the Parish Council will wish to associate themselves with the poor status of the Ver, albeit we are only in the headstream which has never had constant flow. Fish populations generally are being reduced not only by the reduction of river flow, but by predation by cormorants, while native crayfish are killed off by American signal crayfish and others. Bankside voles have been predated by mink, which were released by animal rights activists originally.	Comments noted.
Environment Agency, Hatfield	3.2.47	21	This paragraph could be expanded, or a new paragraph added to expand on groundwater resources. As detailed in our comments for the soil section above, the nature of the underlying geology of the AONB means that	Comments noted. It is not considered necessary to go into the level of detail suggested (e.g. the AONB is not in the Bedford upper Ouse chalk groundwater body). However, suggest that the paragraph is

		<p>there a number of valuable, sensitive groundwater resources. Much of the AONB lies on Principal and Secondary Aquifers. These groundwater resources are also assessed under the WFD – and are designated as either ‘good’ or ‘poor’ status. For example, the Upper Bedford Ouse Chalk groundwater body currently has good chemical status, whilst the Mid-Chilterns Chalk groundwater body has poor chemical status (with no anticipated improvement in status by 2015). All of the waterbodies from which groundwater is abstracted are classified as WFD Drinking Water Protected Areas (DrWPAs). Furthermore, because of the large proportion of groundwater bodies within the AONB from which water is abstracted (for various purposes), they are particularly vulnerable to pollution. There are a large number of agricultural licensed abstractions, private supply boreholes and public drinking water abstractions, some of which may operate without a Permit from the Environment Agency, though their locations should be held on register by the relevant Local Authority under the <i>Private Water Supplies Regulations 1992</i>. Areas around public drinking water abstraction points are particularly sensitive to pollutants, given the likelihood of pollution affecting groundwater directly and potentially preventing the abstraction point from being used anymore. Given this, areas around these abstractions are designated as <i>Source Protection Zones (SPZs)</i>, with SPZ1 being the highest risk area (groundwater within SPZ1 will reach the</p>	<p>amended to reflect the key points raised, as follows.</p> <p>Add a new sentence at the start of paragraph 3.2.47 to read: ‘Chalk is the most significant aquifer in south east England. The Chilterns chalk is a significant aquifer, of regional and national importance, both in terms of the water bodies it supports and for the amount of water that is abstracted from it for public supply.’</p> <p>Also suggest that a new paragraph 3.2.48 is added (and subsequent re-numbering) to read as follows:</p> <p>‘3.2.48 In addition to being limited across the Chilterns the groundwater resource is variable and vulnerable to pollution from both rural and urban sources. All of the Chilterns’ waterbodies from which groundwater is abstracted are classified as Water Framework Directive (WFD) Drinking Water Protected Areas (DrWPAs). Currently the WFD assessment for the three groundwater units which make up the Chilterns and surrounding area are assessed as poor and are subject to a rising trend in pollutant levels.’</p>
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			abstraction within 50 days), then SPZ2 (400 days) and finally SPZ3 (over 400 days). These areas should be considered as potentially very environmentally sensitive, and can be found in locations including Whipsnade, Charton and Hitchin. SPZ maps are available on the ' <i>What's in your backyard?</i> ' section of the Environment Agency website.	
Environment Agency, Hatfield	3.2.49	21	This paragraph indicates that the Grand Union Canal and its Wendover Arm currently achieve good ecological status. This is not correct. Only waterbodies defined as "not artificial or heavily modified" can achieve good <i>status</i> , whereas bodies defined as artificial or heavily modified (including canals) can only achieve good <i>potential</i> . This should be clarified in this paragraph.	Agree with comment, therefore delete 'Status' and replace with 'Potential' in line 4.
Wendover Parish Council	Section 4	22	The Parish Council comments that the major expansion of air traffic proposed for Luton Airport and the construction and residual impact of HS2 should be given more prominence amongst the environmental issues facing the Chilterns which have to be considered.	The issues will be addressed in more detail in the Management Plan itself. However, as they are issues/problems suggest adding reference to HS2 and overflying to the 'traffic movements' element of the 'population' section on page 24.
Environment Agency, Hatfield	Table 1	23	There does not seem to be any cross-reference between ' <i>Biodiversity, flora, fauna</i> ' and ' <i>Water</i> ' despite their being large overlaps between the two sections. There is a need for further cross-referencing between these two sections.	In this instance it is not considered necessary to add a cross reference within the table as the table is short and all elements of it should be considered as a whole.
Hertfordshire County Council	Table 1	23	The issues of declining budgets and a hiatus in the availability of the Environmental Stewardship scheme and uncertainty surrounding this should be included.	Comment noted. This issue is considered to have been addressed in the 'lack of management' element of the 'landscape' section on page 23.
Hertfordshire	Table 1	24	The key environmental issues and problems	Comment noted. This issue is considered to

County Council			faced by the AONB should include Chalara Ash die-back as a landscape issue considering the positive impact that Ash has within the intricate hedged field pattern of the Chilterns.	have been addressed in the 'pests and diseases' element of the 'biodiversity, flora and fauna' section on page 24 (it is not considered necessary to go into detail about each pest and disease here, but this will be covered in the Management Plan itself).
Chiltern District Council	Table 1	25	Trees (second reference on this page) – it states 'decay fungi working for longer could reduce life of veteran trees leading to more problems with tree safety'. I am not sure what this means it maybe I am misunderstanding but are there more fungi or are trees being left to stand for longer?	The fungi within trees that cause decay have been around for longer within older and more veteran trees and as a result bigger and older branches could fall without notice (a safety issue).
Bettina Kirkham	Table 1	25	Under Tranquillity (fifth bullet) – add 'and urban intrusion' after 'development'.	Agree, amend text as suggested.
English Heritage	Table 1	25	In Table 1, the environmental issues for cultural heritage should include the lack of data on the condition of Grade II listed buildings and non-designated assets. The number of the more significant heritage assets at risk, the ongoing harm to those assets, the number of conservation areas without an up-to-date appraisal and management plan and the number of local authorities (if any) without an up-to-date local list may also be environmental issues.	Agree with point made. Therefore add the following at the start of the sentence for 'historic environment' on page 25, to read: 'lack of data on the condition of heritage assets,'.
Environment Agency, Hatfield	Table 1	26	Water/Chalk Streams: A significant issue that has not been identified for chalk streams is the impacts caused by past changes/uses, e.g. weirs, culverts, hard banks, channel straightening and poor management. Where chalk streams pass through urban or semi-urban areas, many of which are outside the AONB boundaries, the issues identified, including those above, are likely to have impacts on ecological value and on fish	Agree with point made. Therefore add the following: 'impacts caused by past changes,' after 'designation' in line 1 of 'chalk streams' section on page 26.

			passage along the whole length of the stream.	
Bettina Kirkham	Table 2	27	First SEA Objective – add ‘character and scenic quality as a whole’ at the end of the objective.	Agree, amend text as follows: delete ‘the’ before ‘landscape’ and add ‘character and scenic quality’ after ‘landscape’, and subsequently change Table 4 on page 29.
English Heritage	Table 2	27	In Table 2, we welcome and support proposed SEA Objectives 3 and 4.	Comments welcomed and noted.
Natural England	Table 2	27	The only comment we would like to make is that the Objectives in Table 2 differ slightly from those in Table 4. In particular: ‘ <i>To increase awareness, understanding and enjoyment of the environment</i> ’ compared with ‘ <i>To increase environmental awareness and understanding.</i> ’ Possibly as a consequence, there are no Assessment Criteria looking at access to nature, though arguably this is picked up under ‘ <i>Will it encourage people to take physical exercise?</i> ’ Clearly there is less need to include this criteria, compared to a Local Plan for example, but we suggest that a criteria along the lines of “ <i>Will it enhance people’s access to nature (including the quality/extent of the public right of way network)</i> ” might be appropriate.	Agree with comments made. Therefore amend Objective 12 in Table 4 to read ‘To increase awareness, understanding and enjoyment of the environment’ and add a new assessment criterion to read ‘Will it enhance people’s access to nature?’.
Environment Agency, Hatfield	Table 2	27	We believe that a further objective needs to be incorporated (or alternatively that objective 9 needs to be re-worded) to “conserve and improve water quality”.	Agree with comment, therefore add ‘including the conservation and improvement of water quality’.
RSPB	Table 3	28	The compatibility of Objective 2 “To conserve and enhance biodiversity” has been labelled as “uncertain compatibility” when compared with Objective 5 “To improve quality of life for those living and working in the AONB” and also when compared with Objective 12 “To increase awareness, understanding and	Comments noted, information resources will be assessed. The uncertainty recorded arises from possible impacts due to potential pressure on resources from increased access to the countryside. No change is proposed.

		<p>enjoyment of the environment". You could label both of these comparisons as compatible since biodiversity should help to increase locals' quality of life and their enjoyment of it too. Studies have shown that time spent in natural environments promotes mental health and wellbeing (Dr William Bird (2007), <i>Natural Thinking – Investigating the links between the Natural Environment, Biodiversity and Mental Health</i>. The RSPB, Sandy; http://www.rspb.org.uk/Images/naturalthinking_tcm9-161856.pdf), for example enhancing the ability to recover from stress and illness, and that these benefits increases with species richness (Fuller, R.A., Irvine, K.N., Devine-Wright, P., Warren, P.H. & Gaston, K.J. (2007). <i>Psychological benefits of greenspace increase with biodiversity</i>. <i>Biology Letters</i>, volume 3 (number 4), p390-394). Studies have also shown that access to the natural environment promotes good physical health, encourages people to take exercise and sustains their participation in physical activity (Dr William Bird (2004), <i>Natural fit – can biodiversity and green space increase levels of physical activity?</i>; http://www.rspb.org.uk/Images/natural_fit_full_version_tcm9-133055.pdf and for a summary of the report; http://www.rspb.org.uk/Images/Natural_fit_tcm9-133056.pdf For a leaflet summarising the findings of this study and the Natural Thinking study; http://www.rspb.org.uk/Images/naturalhealth_tcm9-161955.pdf).</p>	
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Central Bedfordshire Council	Table 3	28	Compatibility of SEA Objectives – Objective 7 is encouraging sustainable forms of energy production which may not be compatible with objectives 1 and 2 which aim at conserving and enhancing landscape and biodiversity; e.g. increase in bio-fuels, short rotation coppice production or renewable energy installations may have a negative impact. This should be acknowledged and mitigation measures should be proposed.	Comments noted and agree with assessment, therefore change ✓ to ? for Table 3 entries for Objective 7 compatibility assessment against Objectives 1 and 2 and add a new assessment criterion to Table 4 for this Objective, to read: 'Will it conserve and enhance landscape character, scenic quality and biodiversity?' Issue of mitigation measures, should they be needed will be addressed in the Management Plan itself.
Environment Agency, Hatfield	Table 3	28	Needs to be updated to reflect our previous comment regarding need for additional objective of rewording of Objective 9.	See response to comment about Table 2, objective 9 amended therefore no change needed to Table 3, though Table 4 will require consequent amendment.
Bettina Kirkham	Table 4	29	Assessment Criteria first bullet point – add 'and distinctiveness' at the end.	Agree to suggested change.
Bettina Kirkham	Table 4	29	Assessment Criteria second bullet point – add 'locally distinctive' after 'stock of'.	Agree to suggested change.
RSPB	Table 4	29	The assessment criteria for Objective 2 "To conserve and enhance biodiversity" should include reference to protected sites (SSSIs etc) and local wildlife sites in addition to BAP habitats.	Agree to suggested change.
English Heritage	Table 4	29	In Table 4, the second assessment criterion for Objective 3 should be "will it conserve or enhance designated, other known or potential historic sites, areas, buildings and features?" Another assessment criterion could be "will it improve access to or understanding of the historic environment?"	Agree to suggested change on second assessment criterion and retain 'of significance' after 'areas' in line 2. Agree to suggested change.
Henley Town Council	Table 4	29	Objective 4 - " <i>To conserve and enhance the built environment and to promote sustainable construction methods</i> " could usefully read:- " <i>To conserve and enhance the built environment by promoting (i) sustainable construction methods and (ii) design features</i> "	Comments noted. No change is proposed as the objective and assessment criteria as currently drafted are considered to address the issues raised, alongside text that will be in the Management Plan itself.

			<i>mitigating adverse impacts of climate change.</i> " and add under right hand column headed Assessment Criteria " <i>Enhance local distinctiveness</i> ".	
Bettina Kirkham	Table 4	29	Assessment Criteria tenth bullet point – suggest deleting ‘respect’ and replacing with ‘conserve’.	Agree to suggested change.
Bettina Kirkham	Table 4	29	Assessment Criteria eleventh bullet point – add ‘and foster a sense of community’ at the end.	Agree to suggested change.
Central Bedfordshire Council	Table 4	30	Objective 7 – assessment criteria: ‘Will it reduce emissions of greenhouse gases by reducing energy consumption?’ – change the criteria to read ‘... reducing energy demand and consumption?’	Agree to suggested change.
Central Bedfordshire Council	Table 4	30	Objective 8 – add assessment criteria: Will it encourage sustainable woodland management and wood fuel production?	Comments noted, though no change is proposed as the issues are considered to be addressed already by Objectives 1, 2, 3, 7 and 8 and their associated assessment criteria.
Environment Agency, Hatfield	Table 4	30	Section 9 – bullet 2 – This could be amended to read: “Will it improve and/or maintain water/water environment quality (including surface and groundwater)?” This is to reflect the WFD requirement of “no deterioration”, which is of equal importance to improvements.	Agree with comments made, therefore propose that assessment criterion be amended to read: ‘Will it maintain or improve the quality of the water environment (surface and groundwater)?’
RSPB	Table 4	30	The assessment criteria for Objective 12 “To increase environmental awareness and understanding” could include reference to memberships to environmental organisations (yourself and your partners) and also the number of people engaging with you through campaigns, your website or through attending local events (for example).	Comments noted, no change proposed as text as drafted is considered to address the issue raised.
Central Bedfordshire	Table 4	30	Additional objective 13 – The proposed SEA framework does not address the issue of	Comments noted, no change proposed as text as drafted (Objectives 2, 4, 7 and 8 and

Council			climate change adaptation and resilience. An appropriate objective should be added to ensure that any actions proposed in the Management Plan will increase the AONB resilience to climate change. The additional objective could read: 'To ensure climate change resilience'; potential assessment criteria could read: Will it ensure woodland and AONB resilience to climate change?	associated assessment criteria) is considered to address the issue raised, which will also be addressed as part of the text of the Management Plan itself.
Environment Agency, Hatfield	6.4	33	The targets/objectives need to be SMART (Specific, Measurable, Achievable, Realistic and Time-bound) in order for progress to be monitored effectively. This must be clearly set out.	The Board is aware that monitoring should relate to SMART targets and objectives and this will be made clear in the Engagement Strategy as part of the Management Plan itself.
English Heritage	6.4.3	33	It is noted (from paragraph 6.4.3) that a suite of indicators will be developed to monitor the evolving condition of the Chilterns AONB. English Heritage would be pleased to assist with that development. You may find our guidance on "Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment" helpful in this regard. (http://www.helm.org.uk/guidance-library/strategic-environ-assessment-sustainability-appraisal-historic-environment/)	The Board is grateful for the offer of assistance in developing indicators.

Comments on Appendix 1

Sheila Pilkington, Markyate	General	<p>The AONB Management Plan support of International and European policies and gives hope that at least European businesses will also need to support these policies.</p> <p>As water, and the involvement of Affinity Water is very important to the success of the policies for sustainable water supply this is significant; their actual shareholders stretched to the Far East last time I checked. Affinity's policy on meeting demand in this area is solely based on abstraction. This will accelerate the destruction of the chalk streams. Where do the policies of the AONB stand do they have the power to change those of a foreign owned commercial company?</p> <p>If abstraction is reduced there will need to be provision of water for the area, even with individual households reducing demand. The way this achieved will need identifying, be it capture of heavy rainfall when it does occur or importation, and this will in turn impact on the AONB in some way.</p> <p>At present, much of the heavy rainfall that reaches rivers is channelled downstream as quickly as possible to avoid flooding and is lost in the sea.</p> <p>It was very noticeable that British Waterways were taking action on their water resources to maintain the canal network many months ahead of the drinking water companies. Navigation at Tring was halted to conserve water many months before there was any publicity to reduce drinking water use.</p>	<p>Comments noted. The Management Plan is a statutory document and the policies contained within it should be taken full account of by those involved in decision-making so as to affect the AONB. Encouragement will be given to local authorities and others to endorse the Management Plan. Water is a key issue within the current Management Plan and this will remain the case in the future.</p>
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			<p>Renewable energy sources need to be accommodated. Electricity pylons and mobile phone masts are here already, wind turbines will probably need to replace them and will become as much part of the scene as pylons are now. Solar panels too will have a place too. The more power that can be created and used locally, the less the need to extend the national grid.</p> <p>It is very difficult to see how the dependence on the car as a means to access work can be reduced in rural areas. In Markyate we are well aware of the economics that makes rural bus services so difficult to provide. This is being exacerbated by the trend not only for out of town shopping centres and industrial estates but also education facilities. Where once a bus journey to a nearby town centre gave access to shops, work and education, it is now a two bus journey, with the need for services to permit practical interchanges. Cycling or walking are not often practical alternatives. To increase working from home and on line shopping are probably the better targets.</p> <p>The increase in house prices in the AONB is continuing to force local youngsters to move away and family units are less able to support each other. This means there are fewer grandparents around to help young Families and vice versa. The provision of affordable housing is therefore very important on many levels.</p>	<p>Comments noted. Renewable energy will be encouraged in appropriate locations.</p> <p>Comments noted and will all be addressed by policies in the Management Plan where possible.</p> <p>Comments noted and issue of provision of affordable housing will be addressed in policies in the Management Plan.</p>
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			The AONB staff are clearly aware of the potential damage that access to the area can cause. It is also important that all users consider others. Cycling is a very popular recreation these days, and very much supported, but irresponsible cycling is a real hazard to other road users, or on the towpath or in the countryside to walkers, children, anglers... Motor cyclists going cross country, illegally is also an abuse we see here in the AONB.	Comments noted and will be addressed via relevant policies in the Management Plan.
Environment Agency, Hatfield	Appendix 1	4	European – You should also include the following legislation: <i>European Floods Directive (2007)</i> .	Agree with comment and will make necessary change.
Environment Agency, Hatfield	Appendix 1	8	National – You should also include the following: <i>Floods & Water Management Act (2010)</i>	Agree with comment and will make necessary change.
Chiltern District Council	Appendix 1	10	Appendix 1 policies plans and programmes page 10 refers to the housing act and the commentary states that the 'policies are included to improve conditions for vulnerable households in privately owned housing.' I know the management plan is all encompassing but I think this is a little bit beyond its scope and abilities.	Agree with comment, therefore propose deletion of 'and policies are included to improve conditions for vulnerable households in privately owned housing' as this is beyond the scope of the Management Plan.
Environment Agency, Hatfield	Appendix 1	12	National – You should also include the following: <i>Flood Risk Regulations (2009)</i> and <i>Groundwater Protection: Principles and Practice (GP3)</i> (available from: https://brand.environment-agency.gov.uk/mb/rGL7f)	Agree with comment and will make necessary changes.
Environment Agency, Hatfield	Appendix 1	12	The Thames River Basin Management Plan (RBMP) (page 12) should be moved into the Regional section because it is a regional	Agree with comment and will make necessary changes.

			document, not national. Also, the Thames RBMP published version is from 2009, and you correctly identify that the next version of the Thames RBMP will be published in 2015 (for the period 2015 – 2021). However, please be aware that we also have published interim WFD classifications for 2010, 2011 and 2012. The raw data can be found here: http://www.environment-agency.gov.uk/research/library/data/97343.aspx , or this can be made available via our Customers and Engagement Team.	
Environment Agency, Hatfield	Appendix 1	20	Regional: You should also include the following document: <i>Thames Corridor CAMS (2004)</i> – regional CAMS strategy that runs in parallel with more local CAMS strategies such as the Colne CAMS, and due for update in April 2014 (available from: http://publications.environment-agency.gov.uk/pdf/GETH0604BHZE-E-E.pdf).	Agree with comment and will make necessary changes.
Environment Agency, Hatfield	Appendix 1	20	Please be aware that the Colne CAMS that is referenced at the bottom of page 20 has been updated and published in February 2013. The latest version can be found here: http://publications.environment-agency.gov.uk/pdf/GETH0108BLUD-E-E.pdf .	Agree with comment and will make necessary changes.
Environment Agency, Hatfield	Appendix 1	21	Please be aware that the Thames Region Catchment Flood Management Plan that is referenced on page 21 has been updated and published in July 2008, and is no longer in draft form. The latest version can be found here: http://publications.environment-agency.gov.uk/pdf/GETH1209BQYL-e-e.pdf .	Agree with comment and will make necessary changes.

Comments on Appendix 2

Environment Agency, Hatfield	Appendix 2	12	Soil and land quality: Another data source to include will be Local Planning Authorities (LPAs) within the individual Local Authorities, who will hold information on development sites having to undertake remediation due to land contamination.	Agree with comment, therefore add 'and development sites' before 'data' in line 3 of data sources column for soil contamination.
Environment Agency, Hatfield	Appendix 2	14	Water (WFD): Please also refer to our previous comments regarding WFD earlier in this response (e.g. availability of interim data). In the data sources section, the Thames RBMP (2009 & 2015) should be included, as well as interim data available from us. In the key facts section, groundwater bodies should be mentioned (e.g. Mid-Chilterns Chalk and Upper Bedford Ouse Chalk).	Agree with comments and propose making changes accordingly, though as the Chilterns is not part of the Upper Bedford Ouse Chalk this should not be included. Therefore add the following: <ul style="list-style-type: none"> • 'and 2015' after first paragraph of Targets and Issues; • '(interim data for 2010, 2011 and 2013 available)' after 'Environment Agency' in Data sources column, and • 'and groundwater bodies (such as the Mid-Chilterns Chalk) are also under pressure' at the end of the first Key Fact.

Item 11 **Draft Position Statement on
Renewable Energy Policy**

Author: Steve Rodrick Chief Officer
 Colin White Planning Officer

Summary: The Board is committed to preparing a series of planning position statements to cover a wide range of issues. This first covers renewable energy including wind, solar and biomass. The primary audiences are developers and local planning authorities but it will also be useful to parish councils, amenity bodies and those who comment on these sorts of developments.

Purpose of Report: To seek approval for the draft position statement.

Background

1. There are few, if any, protected landscapes which are subject to more development pressure or individual planning applications. As the Board has long recognised it is impossible and undesirable to comment on them all, (there are probably in excess of 3,000 applications per annum) and has instead, decided it would only comment on a small number which are important due to their scale, sensitivity or scope to set a precedent. In recent years detailed comments have only been made on between 30-50 applications.
2. The other two primary means of influencing the planning system and local decisions are by commenting on key planning strategies and documents, mainly those issued by the local planning authorities; and by publishing detailed guidance on building design and use of materials. Training has been given to planning authorities and others to promote the use of this guidance.
3. It was decided three years ago that the Board should also prepare and publish its policies covering a wide range of planning issues. Progress has been slow but the first on renewable energy is now ready for consideration by the Board, having already been considered and amended by the Planning Committee.

Wind

4. Despite the relative height of the Chiltern Hills there have been no applications for wind farms, although a small number of applications have been made for isolated turbines in the Vale of Aylesbury which, arguably, affect the setting of the AONB and views from it. With the national policy, planning and financial contexts for wind farms constantly fluctuating, as well as changes to the technology, it is unlikely there will be proposals to place large turbines in the AONB in the near future, but it cannot be ruled out.

Solar

5. Following recent changes to the tariffs for solar energy there has been a massive increase in the number of houses and farms with solar panels on their roofs. Whilst small scale in impact, in some locations, there has been a cause for concern.
6. More recently there has been an increase in interest, in establishing commercial ground based solar farms with tens of thousands of panels covering tens of hectares. Two such applications are currently in the system near Hemel Hempstead and Bledlow, not far from the Board's office. Both are outside the AONB but close to the boundary and require the Board's full attention. The Planning Committee has established a sub group to take a detailed look at both proposals.

Biomass

7. The third main area of renewable energy is that of biomass. This is likely to be less contentious and is a form of energy the Chilterns has a greater capacity to generate and accommodate. However, the size of some anaerobic digesters is large and their siting requires careful consideration.
8. The full draft Position Statement is attached as Appendix 1. If approved by the Board it will be published and circulated directly to local authorities, including parish and town councils.

Recommendations

1. **The Board considers and approves the draft Renewable Energy position statement.**
2. **Subject to any changes the Position Statement is published and circulated directly to local planning authorities.**

Appendix 1



**Chilterns Conservation Board
Draft Position Statement**

Renewable Energy

Introduction

1. Global warming and climate change are generally acknowledged as major threats to environmental well-being arising from the production of greenhouse gases, the main one of which is carbon dioxide, produced principally from the burning of fossil fuels. Renewable sources of energy, however, produce no or limited levels of CO₂ and their use can therefore be a major contributor to reducing greenhouse gas emissions.
2. Under the Climate Change Act 2008 the Government is committed to delivering an 80% reduction in greenhouse gas emissions by 2050. This includes a 34% reduction by 2020. In order to achieve these reductions a number of actions will need to take place, notably improving energy efficiency and reducing the demand for power.
3. The Chilterns Conservation Board recognises that major benefits can arise from seeking greater energy efficiency. This may take the form of reduced need to travel, better insulation of existing buildings and the use of energy efficient appliances and lights. Therefore, seeking to increase energy generation (even if it is renewable) is not sufficient and much work needs to be undertaken to reduce energy demand, conserve energy and to use what is generated as efficiently as possible. Ways of achieving this may include reducing external and highway lighting for example, which may also benefit the AONB through protection of dark skies.
4. The UK is also committed to increasing the percentage of power that it produces from renewable sources to 20% by 2020, and reducing its dependence on fossil fuels. Support for the development of small-scale and local power generation facilities, is therefore an important part of this equation.
5. It is equally important that the Chilterns Area of Outstanding Natural Beauty (AONB) plays its part in reducing emissions and this may be helped by the small-scale, local generation of energy from renewable sources. However, any schemes should ensure the conservation and enhancement of the natural beauty of the area.
6. The primary purpose of the AONB designation is to conserve and enhance the natural beauty of the area. This is confirmed by Section 82 of the Countryside and Rights of Way Act 2000 (CRoW Act 2000). Section 85 of the CRoW Act 2000 places a duty on all relevant authorities to have regard to this purpose in exercising or performing any functions in relation to, or so as to affect, land in AONBs. This includes potential developments outside the AONBs that might affect the natural beauty (including visual amenity and tranquillity) of the AONB or its setting. In policy terms AONBs have the same planning status as National Parks.
7. The Chilterns Conservation Board is the body set up by Parliament to conserve and enhance the natural beauty of the Chilterns AONB and increase the understanding and enjoyment of the special qualities of the AONB. The

Board also has a duty to have regard to the social and economic wellbeing of those who live and work in the Chilterns AONB.

8. The Board also recognises the need for renewable energy projects in order to reduce our collective reliance on fossil fuels for generation. However, not all forms of renewable energy project may be suitable within the AONB or its setting.
9. The Board encourages the use of renewable energy in appropriate locations within the AONB or its setting, provided it is consistent with conserving and enhancing the landscape and natural beauty of the area. This policy is contained in the Chilterns AONB Management Plan and is in line with Government and emerging local policies (see relevant local authority local plan or core strategy for more information). However, the purpose of designating an AONB should take priority over other considerations because the contribution that can be made from the AONB to national and regional renewable energy generation targets is small while the harm to what is landscape of national importance enjoyed by many people could be great.

Purpose of this Position Statement

10. **This Position Statement is intended to provide advice and guidance to local planning authorities, landowners, developers and other interested parties in connection with the need to consider the impacts of renewable energy development on the Chilterns AONB and its setting.** In connection with all appropriate developments, account should also be taken of advice in the Board's Position Statement on 'Development affecting the setting of the Chilterns AONB' published in June 2011.
11. This Statement expands upon a number of policies and issues raised in the Chilterns AONB Management Plan 2014-19: A Framework for Action¹, particularly the following:

Policy L4: Conserve and enhance the distinctive character of buildings, rural settlements and their landscape setting.

Policy L5: Resist developments which detract from the Chilterns' special character.

Policy L7: Encourage the removal or mitigation of intrusive developments and features.

Policy L8: Conserve the quality of the setting of the AONB by ensuring the impact of adjacent development is sympathetic to the character of the Chilterns and maintains the quality of views to and from it.

¹ Draft Chilterns AONB Management Plan 2014-19: A Framework for Action, CCB, September 2013

Policy L11: Ensure the cumulative impact of developments and land use changes do not adversely affect landscape quality and character.

Policy L13: Ensure conservation and enhancement of tranquillity is a major consideration when planning all development and major landscape management.

Policy HE3: Resist changes and management practices which would harm the historic environment and its setting.

Policy HE5: Ensure the design and location of development is sympathetic to the character of the historic environment including the setting of heritage assets.

Policy D10: Ensure, in connection with relevant developments, that full account is taken of the likely impacts on the setting of the AONB.

Policy D11: Seek a reduction in the damaging impacts of utilities and other infrastructure.

Policy D12: Seek enhancement of the landscape of the AONB by the removal or mitigation of intrusive developments.

Policy D14: Encourage the use of renewable energy (particularly wood fuel, solar, hydro-power and ground source heat pumps) in appropriate locations.

Renewable Energy – Position Statement

12. The Government published the National Planning Policy Framework (NPPF) in 2012. The NPPF details the Government's planning policies in connection with various issues and states that local planning authorities should actively support energy efficiency improvements to existing buildings (paragraph 95) and should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources (paragraph 97). Local planning authorities should also have a positive strategy to promote energy from renewable and low carbon sources and design policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts (paragraph 97).
13. The NPPF states that 'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty' (paragraph 115). The NPPF also states that 'planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest' (paragraph 116).

14. The NPPF also includes a cross reference to the National Policy Statement for Renewable Energy Infrastructure (EN-3). This states that in sites with nationally recognised designations, such as AONBs, consent for renewable energy projects should 'only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits' (paragraph 2.5.33).
15. The policies from the NPPF should influence the production of local plans by the local planning authorities of the Chilterns and the Board will comment on these where necessary.
16. The Board considers, based on past planning applications and enquiries, that the following forms of renewable energy may be proposed within the AONB or its setting and are therefore likely to have impacts on the AONB and its enjoyment:
- Wind turbines and wind farms;
 - Biofuel, biomass and anaerobic digestion;
 - Solar photovoltaic (domestic scale and solar farms);
 - Solar hot water;
 - Hydro-electric and
 - Ground- and air-source heat pumps.
17. The Board considers that the following definitions of scale should be used throughout this Statement for the relevant technologies as they apply to the Chilterns:

Technology	Micro	Small-scale	Medium-scale	Large-scale
Wind turbines	15m tall or less to blade tip	15-60m to blade tip	60-90m to blade tip	90m+ tall
Wind farm	single	1 -5 turbines	6-10 turbines	11+ turbines
Wood fuel, biofuel and biomass	Household	Household, business or farm based	Over 10MW, electricity not consumed on site	Electricity not consumed on site
Anaerobic digestion	Household or farm based	Cluster of farms, site less than 0.5ha	Site over 0.5ha, serving many farms	Site over 1.0ha, serving wider area
Photovoltaics	Household, up to 5kW	Household, business or farm based, less than	10 - 50kW arrays, electricity not all consumed	Over 50kW, electricity not consumed on

		10kW	on site	site
Hydro-electric power	Less than 100kW	Less than 10MW	Over 10MW	Over 10MW
Heat pumps	Household	Business or farm based		

18. The Board considers that medium- to large-scale renewable energy developments will not generally be appropriate within the Chilterns AONB or in locations beyond the AONB boundary where such development would affect its setting and character, as they would have significant potential to adversely affect the natural beauty of the AONB and to compromise the purpose of the AONB contrary to national planning policy.
19. Particular account should be taken of the noise impacts of all technologies, and as part of the assessment of all proposals the impacts of associated traffic should also be subject to assessment (for example lorry movements associated with the delivery of biomass). The Board is likely to engage with larger, complex and more controversial cases, though all cases will be considered and any likely harm assessed accordingly.
20. The Board recognises the positive contribution and general acceptability of carefully located micro- and small-scale schemes. However, the Board considers that, though such renewable energy developments may be appropriate within the AONB and its setting, this must be based on a full account being taken of the likely impacts of such developments through the production of thorough landscape and visual impact assessments and environmental impact assessments as necessary.
21. The different forms of renewable energy development require different infrastructure, which in turn has different landscape and other implications. Whilst the generation of power by renewable means in appropriate circumstances is generally to be supported as a contributor to sustainable development, the conservation and enhancement of nationally important landscapes such as the Chilterns AONB is also important and should not be set aside.

Wind turbines and wind farms

22. Much of the AONB is unlikely to be able to accommodate wind turbine developments above 25m due to the topography and land cover of the area and impacts on the wind resource (of woodland for example) and the likelihood of causing real harm to the character and qualities of the AONB. Even with turbines below 25m there is still a risk that in many exposed locations the turbines would not be compatible with the purposes of designation (the conservation and enhancement of the natural beauty of the AONB).
23. To be acceptable within the AONB the Board considers that micro- and small-scale wind energy development should: be of a form and design that is

appropriate for the landscape and visual characteristics of the location; be an appropriate scale for the chosen location; not be sited on a skyline; not be sited close to a prominent feature or within the setting of important heritage assets or historic landscapes, and not have significant cumulative impacts alongside other operational or consented wind energy proposals.

24. Wind turbines, within or outside the AONB, of a scale intended to supply electricity only to the national grid or to urban areas outside the AONB will generally be objected to unless it can be clearly demonstrated to the satisfaction of the Board that the proposed installation would not, individually or in conjunction with other existing installations, be to the detriment of the natural beauty, character, amenity and/or nature conservation interest of the AONB through visual intrusion, noise, activity or associated infrastructure such as overhead lines. The Board recommends that alternative forms of energy generation should be considered before medium- and large-scale wind turbines and wind farms.
25. In addition, micro- and small-scale turbines may also be considered to be unacceptable, unless they are well located in less exposed locations or naturally screened in some way for example. There may also be issues over cumulative harm if more than one turbine is proposed, even if below 25m in height, as this may change the character of an area, particularly if it is open, undeveloped or tranquil in character.
26. In all cases: exposed scarp top, hillside and hilltop; open vale; open valley and open downland areas are the least likely landscapes where development of this kind could be accommodated without causing significant harm to the AONB.

Wood fuel, biofuel and biomass

27. **The use of wood to fuel boilers is not only a renewable source of energy**, but may have the additional benefits of providing an economic incentive to bring neglected woodlands back into active management or recovering waste wood from the waste stream that would otherwise go to landfill. The Board therefore generally supports the principle of thermal energy production using wood fuel, particularly at a domestic or micro-scale and utilising locally-sourced sustainable timber rather than imports (especially wood pellets). Care would be needed in the location of any replacement planting.
28. There may be potential from other grown crops for biofuel production. Such developments are likely to have limited impacts if undertaken on a generally small-scale. However, careful consideration will need to be given for larger-scale use of land for growing such crops. Sensitive sites (for example permanent grassland, common land, SSSIs and other sites of nature conservation importance and historic landscapes) should be avoided. Where new crops are being introduced the potential for detrimental impacts on landscape character should be fully assessed.

29. The transport of wood or crops to any energy production plant will necessitate increased vehicle movements in the area, unless the plant is located adjacent to the source of fuel, although the plants themselves have to be close to the settlements or facilities they serve to avoid unnecessary infrastructure, so an appropriate locational balance must therefore be achieved. For this reason, and to avoid the greater visual and other effects likely to be caused by large-scale plants, the Board would favour no more than small-scale plants rather than medium- or large-scale, centralised installations.
30. New buildings may be needed to process or dry harvested wood and other biomass. The siting, scale, design, colours and materials of any new buildings should always be carefully considered and should adhere to the advice contained in the Chilterns Buildings Design Guide and supplementary technical notes on materials (flint, brick and roofing materials) if appropriate.

Anaerobic digestion

31. Anaerobic digestion plants serving a single or small number of local farms may be appropriate within the AONB, provided that the development: can be incorporated within an existing farmstead; uses locally sourced material; is of an appropriate scale; is not visually intrusive; is constructed using appropriate materials and is suitably landscaped to ensure the natural beauty of the area is conserved or enhanced.
32. Care will be needed to ensure that land use in the vicinity of the plant is not altered in order to grow crops such as maize which may not normally be expected to be cultivated in the area. Care will also be needed in connection with the consideration of the effects and potential harm that may arise from visual intrusion, noise, increased activity, odour, associated traffic movements and associated infrastructure such as overhead powerlines and pylons or poles to support them. Large new buildings and structures on greenfield sites within the AONB or its setting, importing large quantities of material from outside the immediate area on a significant scale will not be supported.

Solar photovoltaic (domestic scale and solar farms)

33. Solar power can take the form of passive solar gain (orientating buildings and using glazing to maximise heat from the sun), photovoltaic cells (generating electricity) or solar panels (heating water).
34. Generally, solar power installations will be micro- or small-scale, usually serving individual properties, and are likely to have minimal landscape or other impacts if appropriately sited on buildings or land. The Board will therefore generally not object to such installations, many of which now benefit from permitted development rights. Concerns may arise in connection with micro- or small-scale schemes in respect of listed buildings or non-designated heritage assets, and in Conservation Areas, where a solar array may be considered to detract from the character and appearance of the building or area. With careful design and siting even these locations may be appropriate for such installations.

35. Subject to the location of panels on the top (and in exceptional circumstances) the side of existing buildings, large well-designed solar arrays are likely to be acceptable. There are many large farm buildings where panels could be placed with little or no negative impact on the landscape of the AONB.
36. If a more substantial free-standing solar array proposal (a solar farm) were to be submitted (above 1 hectare for example) the Board considers that paragraph 116 of the NPPF would apply as this would be considered to be a major development. If such schemes are submitted on the basis of exceptional circumstances then the Board would adopt a criteria based approach following the principles outlined in the NPPF paragraph 116. It is extremely unlikely that any location could be found within the AONB or its setting where such large solar farms would not have a significant adverse impact on the landscape, sense of remoteness, tranquillity, natural beauty and landscape character for which the AONB is valued. The Board considers that such installations would directly conflict with the purpose of designation.

Solar hot water

37. The same principles that apply to solar photovoltaic installations at the micro- or small-scale apply to solar hot water installations. These will generally only be provided at a domestic scale and provided that the siting and design are carefully considered they will usually be acceptable, and may also benefit from permitted development rights. Care will also be needed in respect of listed buildings and in Conservation Areas as detailed above.

Hydro-electric

38. The Board considers that medium- or large-scale hydro-electric proposals are likely to be limited within the AONB and its setting due to geographical and environmental restrictions. However, micro- or small-scale projects would generally be acceptable. The AONB is bordered in part by the River Thames and it is known that there is interest in promoting hydro-electric schemes. The Board has supported feasibility work on a project at Goring and Streatley through its previous Sustainable Development Fund.
39. To be acceptable, proposals should: ensure that equipment is placed either in existing buildings or new ones of an appropriate scale and design; use the existing head of water from existing impoundments without affecting the river's flow; ensure that fish populations and other river life are not detrimentally affected, and in the view of the relevant agencies operate without prejudicing progress towards achieving ecological objectives under the Water Framework Directive.

Ground- and air-source heat pumps

40. Heat pumps, using ground, water or air are generally classed as permitted development for residential dwellings. In most cases proposals are likely to be domestic in scale and due to their relatively limited landscape impact will

normally be acceptable. Any reinstatement of land should be carefully and sensitively undertaken and historic landscapes should, wherever possible, be avoided.

41. If buildings are required to house pumps or other equipment then these may require planning permission and should be carefully sited and designed, using appropriate materials.

General advice

42. The Board advises that renewable energy developments should be located where:

- They are appropriate to the landscape character;
- They would not be a dominant feature in the landscape;
- They are sited well back from scarp tops, hilltop edges, skylines, summits, prominent landforms and other distinctive landscape features;
- They make sympathetic use of existing buildings, tracks and other infrastructure;
- There would be no significant cumulative impacts due to other similar developments;
- There are opportunities to mitigate landscape and visual impacts and compensate for any unavoidable loss;
- They are away from key amenity and heritage assets;
- They respect and are sensitive to important cultural associations;
- They are away from public views (roads, footpaths and public open spaces) if at all possible, and
- They are within existing built-up areas (a farmstead or settlement for example) where a strong functional relationship would be established, rather than in isolated locations away from other built structures.

43. Due to the temporary nature of many of the renewable energy technologies listed above, the Board would expect local planning authorities to apply appropriate conditions to planning permissions that seek the removal of any buildings and any other structures at the end of the life of the proposed installation or when they become obsolete.

44. Each of the renewable energy technologies detailed above may have drawbacks in their implementation. The Board wishes to work with those promoting such schemes as well as those that decide applications in order to try and overcome any problems in a way which is consistent with the purposes of the AONB.

45. The Board will expect local authorities, in accordance with their duties under Section 85 of the Countryside and Rights of Way Act 2000, to be mindful of both the possible positive and negative impacts of a development, within the AONB and its setting, on the natural beauty and special qualities of the AONB when determining planning applications. When significant impacts are likely the Board would like its views to be sought.

46. Though this Position Statement includes information about all relevant technologies, it is possible that new technologies will emerge in time. Should this happen the general principles of this Position Statement should apply prior to any revisions being carried out.

NOTES

The Chilterns Conservation Board has the statutory duty² to pursue the following two purposes:

- a) to conserve and enhance the natural beauty of the AONB; and
- b) to increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board shall seek to foster the economic and social well-being of people living in the AONB.

This is one of a series of position statements to be published by the Board which help to expand on the Board's policies within the Chilterns AONB Management Plan or explain the Board's approach to new and emerging issues.

Further information and advice is contained in the following: The Chilterns Buildings Design Guide and the associated supplementary technical notes on local building materials, the Environmental Guidelines for the Management of Highways in the Chilterns and The Making of the Chilterns Landscape. All of these can be found on the Board's website.

The Board is comprised of members nominated by the local authorities, elected parish council appointees and individuals appointed by the Secretary of State. The Board, formed in December 2004, is the only organisation that looks after the AONB as a whole.

The Chilterns AONB was designated in 1965 and extended in area in 1990. It occupies 833 square kilometres and is a landscape of equal importance to National Parks such as Snowdonia and the Lake District.

For further information contact:

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² Section 87, Countryside and Rights of Way Act 2000



Chilterns Conservation Board – Position Statement

Renewable Energy

Introduction

1. Global warming and climate change are generally acknowledged as major threats to environmental well-being arising from the production of greenhouse gases, the main one of which is carbon dioxide, produced principally from the burning of fossil fuels. Renewable sources of energy, however, produce no or limited levels of CO₂ and their use can therefore be a major contributor to reducing greenhouse gas emissions.

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4. The UK is also committed to increasing the percentage of power that it produces from renewable sources to 20% by 2020, and reducing its dependence on fossil fuels. Support for the development of small-scale and local power generation facilities, is therefore an important part of this equation.

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Policy L8: Conserve the quality of the setting of the AONB by ensuring the impact of adjacent development is sympathetic to the character of the Chilterns and maintains the quality of views to and from it.

Policy L11: Ensure the cumulative impact of developments and land use changes do not adversely affect landscape quality and character.

Policy L13: Ensure conservation and enhancement of tranquility is a major consideration when planning all development and major landscape management.

¹ Draft Chilterns AONB Management Plan 2014-19: A Framework for Action, CCB, September 2013

Policy HE3: Resist changes and management practices which would harm the historic environment and its setting.

Policy HE5: Ensure the design and location of development is sympathetic to the character of the historic environment including the setting of heritage assets.

Policy D10: Ensure, in connection with relevant developments, that full account is taken of the likely impacts on the setting of the AONB.

Policy D11: Seek a reduction in the damaging impacts of utilities and other infrastructure.

Policy D12: Seek enhancement of the landscape of the AONB by the removal or mitigation of intrusive developments.

Policy D14: Encourage the use of renewable energy (particularly wood fuel, solar, hydro-power and ground source heat pumps) in appropriate locations.

Renewable Energy – Position Statement

12. The Government published the National Planning Policy Framework (NPPF) in 2012. The NPPF details the Government's planning policies in connection with various issues and states that local planning authorities should actively support energy efficiency improvements to existing buildings (paragraph 95) and should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources (paragraph 97). Local planning authorities should also have a positive strategy to promote energy from renewable and low carbon sources and design policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts (paragraph 97).

13. The NPPF states that 'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty' (paragraph 115). The NPPF also states that 'planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest' (paragraph 116).

14. The NPPF also includes a cross reference to the National Policy Statement for Renewable Energy Infrastructure (EN-3). This states that in sites with nationally recognised designations, such as AONBs, consent for renewable energy projects should 'only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits' (paragraph 2.5.33).

15. The policies from the NPPF should influence the production of local plans by the local planning authorities of the Chilterns and the Board will comment on these where necessary.

16. The Board considers, based on past planning applications and enquiries, that the following forms of renewable energy may be proposed within the AONB or its setting and are therefore likely to have impacts on the AONB and its enjoyment:

- Wind turbines and wind farms;
- Biofuel, biomass and anaerobic digestion;
- Solar photovoltaic (domestic scale and solar farms);
- Solar hot water;
- Hydro-electric and
- Ground- and air-source heat pumps.

17. The Board considers that the following definitions of scale should be used throughout this Statement for the relevant technologies as they apply to the Chilterns:

Technology	Micro	Small-scale	Medium-scale	Large-scale
Wind turbines	15m tall or less to blade tip	15-60m to blade tip	60-90m to blade tip	90m+ tall
Wind farm	single	1 -5 turbines	6-10 turbines	11+ turbines
Wood fuel, biofuel and biomass	Household	Household, business or farm based	Over 10MW, electricity not consumed on site	Electricity not consumed on site
Anaerobic digestion	Household or farm based	Cluster of farms, site less than 0.5ha	Site over 0.5ha, serving many farms	Site over 1.0ha, serving wider area
Photovoltaics	Household, up to 5kW	Household, business or farm based, less than 10kW	10 - 50kW arrays, electricity not all consumed on site	Over 50kW, electricity not consumed on site
Hydro-electric power	Less than 100kW	Less than 10MW	Over 10MW	Over 10MW
Heat pumps	Household	Business or farm based		

18. The Board considers that medium- to large-scale renewable energy developments will not generally be appropriate within the Chilterns AONB or in locations beyond the AONB boundary where such development would affect its setting and character, as they would have significant potential to adversely affect the natural beauty of the AONB and to compromise the purpose of the AONB contrary to national planning policy.

19. Particular account should be taken of the noise impacts of all technologies, and as part of the assessment of all proposals the impacts of associated traffic should also be subject to assessment (for example lorry movements associated with the delivery of biomass). The Board is likely to engage with larger, complex and more controversial cases, though all cases will be considered and any likely harm assessed accordingly.

20. The Board recognises the positive contribution and general acceptability of carefully located micro- and small-scale schemes. However, the Board considers that, though such renewable energy developments may be appropriate within the AONB and its setting, this must be based on a full account being taken of the likely impacts of such developments through the production of thorough landscape and visual impact assessments and environmental impact assessments as necessary.

21. The different forms of renewable energy development require different infrastructure, which in turn has different landscape and other implications. Whilst the generation of power by renewable means in appropriate circumstances is generally to be supported as a contributor to sustainable development, the conservation and enhancement of nationally important landscapes such as the Chilterns AONB is also important and should not be set aside.

Wind turbines and wind farms

22. Much of the AONB is unlikely to be able to accommodate wind turbine developments above 25m due to the topography and land cover of the area and impacts on the wind resource (of woodland for example) and the likelihood of causing real harm to the character and qualities of the AONB. Even with turbines below 25m there is still a risk that in many exposed locations the turbines would not be compatible with the purposes of designation (the conservation and enhancement of the natural beauty of the AONB).

23. To be acceptable within the AONB the Board considers that micro- and small-scale wind energy development should: be of a form and design that is appropriate for the landscape and visual characteristics of the location; be an appropriate scale for the chosen location; not be sited on a skyline; not be sited close to a prominent feature or within the setting of important heritage assets or historic landscapes, and not have significant cumulative impacts alongside other operational or consented wind energy proposals.

24. Wind turbines, within or outside the AONB, of a scale intended to supply electricity only to the national grid or to urban areas outside the AONB will generally be objected to unless it can be clearly demonstrated to the satisfaction of the Board that the proposed installation would not, individually or in conjunction with other

existing installations, be to the detriment of the natural beauty, character, amenity and/or nature conservation interest of the AONB through visual intrusion, noise, activity or associated infrastructure such as overhead lines. The Board recommends that alternative forms of energy generation should be considered before medium- and large-scale wind turbines and wind farms.

25. In addition, micro- and small-scale turbines may also be considered to be unacceptable, unless they are well located in less exposed locations or naturally screened in some way for example. There may also be issues over cumulative harm if more than one turbine is proposed, even if below 25m in height, as this may change the character of an area, particularly if it is open, undeveloped or tranquil in character.

26. In all cases: exposed scarp top, hillside and hilltop; open vale; open valley and open downland areas are the least likely landscapes where development of this kind could be accommodated without causing significant harm to the AONB.

Wood fuel, biofuel and biomass

27. The use of wood to fuel boilers is not only a renewable source of energy, but may have the additional benefits of providing an economic incentive to bring neglected woodlands back into active management or recovering waste wood from the waste stream that would otherwise go to landfill. The Board therefore generally supports the principle of thermal energy production using wood fuel, particularly at a domestic or micro-scale and utilising locally-sourced sustainable timber rather than imports (especially wood pellets). Care would be needed in the location of any replacement planting.

28. There may be potential from other grown crops for biofuel production. Such developments are likely to have limited impacts if undertaken on a generally small-scale. However, careful consideration will need to be given for larger-scale use of land for growing such crops. Sensitive sites (for example permanent grassland, common land, SSSIs and other sites of nature conservation importance and historic landscapes) should be avoided. Where new crops are being introduced the potential for detrimental impacts on landscape character should be fully assessed.

29. The transport of wood or crops to any energy production plant will necessitate increased vehicle movements in the area, unless the plant is located adjacent to the source of fuel, although the plants themselves have to be close to the settlements or facilities they serve to avoid unnecessary infrastructure, so an appropriate locational balance must therefore be achieved. For this reason, and to avoid the greater visual and other effects likely to be caused by large-scale plants, the Board would favour no more than small-scale plants rather than medium- or large-scale, centralised installations.

30. New buildings may be needed to process or dry harvested wood and other biomass. The siting, scale, design, colours and materials of any new buildings should always be carefully considered and should adhere to the advice contained in

the Chilterns Buildings Design Guide and supplementary technical notes on materials (flint, brick and roofing materials) if appropriate.

Anaerobic digestion

31. Anaerobic digestion plants serving a single or small number of local farms may be appropriate within the AONB, provided that the development: can be incorporated within an existing farmstead; uses locally sourced material; is of an appropriate scale; is not visually intrusive; is constructed using appropriate materials and is suitably landscaped to ensure the natural beauty of the area is conserved or enhanced.

32. Care will be needed to ensure that land use in the vicinity of the plant is not altered in order to grow crops such as maize which may not normally be expected to be cultivated in the area. Care will also be needed in connection with the consideration of the effects and potential harm that may arise from visual intrusion, noise, increased activity, odour, associated traffic movements and associated infrastructure such as overhead powerlines and pylons or poles to support them. Large new buildings and structures on greenfield sites within the AONB or its setting, importing large quantities of material from outside the immediate area on a significant scale will not be supported.

Solar photovoltaic (domestic scale and solar farms)

33. Solar power can take the form of passive solar gain (orientating buildings and using glazing to maximise heat from the sun), photovoltaic cells (generating electricity) or solar panels (heating water).

34. Generally, solar power installations will be micro- or small-scale, usually serving individual properties, and are likely to have minimal landscape or other impacts if appropriately sited on buildings or land. The Board will therefore generally not object to such installations, many of which now benefit from permitted development rights. Concerns may arise in connection with micro- or small-scale schemes in respect of listed buildings or non-designated heritage assets, and in Conservation Areas, where a solar array may be considered to detract from the character and appearance of the building or area. With careful design and siting even these locations may be appropriate for such installations.

35. Subject to the location of panels on the top (and in exceptional circumstances) the side of existing buildings, large well-designed solar arrays are likely to be acceptable. There are many large farm buildings where panels could be placed with little or no negative impact on the landscape of the AONB.

36. If a more substantial free-standing solar array proposal (a solar farm) were to be submitted (above 1 hectare for example) the Board considers that paragraph 116 of the NPPF would apply as this would be considered to be a major development. If such schemes are submitted on the basis of exceptional circumstances then the Board would adopt a criteria based approach following the principles outlined in the NPPF paragraph 116. It is extremely unlikely that any location could be found within the AONB or its setting where such large solar farms would not have a significant

adverse impact on the landscape, sense of remoteness, tranquility, natural beauty and landscape character for which the AONB is valued. The Board considers that such installations would directly conflict with the purpose of designation.

Solar hot water

37. The same principles that apply to solar photovoltaic installations at the micro- or small-scale apply to solar hot water installations. These will generally only be provided at a domestic scale and provided that the siting and design are carefully considered they will usually be acceptable, and may also benefit from permitted development rights. Care will also be needed in respect of listed buildings and in Conservation Areas as detailed above.

Hydro-electric

38. The Board considers that medium- or large-scale hydro-electric proposals are likely to be limited within the AONB and its setting due to geographical and environmental restrictions. However, micro- or small-scale projects would generally be acceptable. The AONB is bordered in part by the River Thames and it is known that there is interest in promoting hydro-electric schemes. The Board has supported feasibility work on a project at Goring and Streatley through its previous Sustainable Development Fund.

39. To be acceptable, proposals should: ensure that equipment is placed either in existing buildings or new ones of an appropriate scale and design; use the existing head of water from existing impoundments without affecting the river's flow; ensure that fish populations and other river life are not detrimentally affected, and in the view of the relevant agencies operate without prejudicing progress towards achieving ecological objectives under the Water Framework Directive.

Ground- and air-source heat pumps

40. Heat pumps, using ground, water or air are generally classed as permitted development for residential dwellings. In most cases proposals are likely to be domestic in scale and due to their relatively limited landscape impact will normally be acceptable. Any reinstatement of land should be carefully and sensitively undertaken and historic landscapes should, wherever possible, be avoided.

41. If buildings are required to house pumps or other equipment then these may require planning permission and should be carefully sited and designed, using appropriate materials.

General advice

42. The Board advises that renewable energy developments should be located where:

- They are appropriate to the landscape character;
- They would not be a dominant feature in the landscape;

- They are sited well back from scarp tops, hilltop edges, skylines, summits, prominent landforms and other distinctive landscape features;
- They make sympathetic use of existing buildings, tracks and other infrastructure;
- There would be no significant cumulative impacts due to other similar developments;
- There are opportunities to mitigate landscape and visual impacts and compensate for any unavoidable loss;
- They are away from key amenity and heritage assets;
- They respect and are sensitive to important cultural associations;
- They are away from public views (roads, footpaths and public open spaces) if at all possible, and
- They are within existing built-up areas (a farmstead or settlement for example) where a strong functional relationship would be established, rather than in isolated locations away from other built structures.

43. Due to the temporary nature of many of the renewable energy technologies listed above, the Board would expect local planning authorities to apply appropriate conditions to planning permissions that seek the removal of any buildings and any other structures at the end of the life of the proposed installation or when they become obsolete.

44. Each of the renewable energy technologies detailed above may have drawbacks in their implementation. The Board wishes to work with those promoting such schemes as well as those that decide applications in order to try and overcome any problems in a way which is consistent with the purposes of the AONB.

45. The Board will expect local authorities, in accordance with their duties under Section 85 of the Countryside and Rights of Way Act 2000, to be mindful of both the possible positive and negative impacts of a development, within the AONB and its setting, on the natural beauty and special qualities of the AONB when determining planning applications. When significant impacts are likely the Board would like its views to be sought.

46. Though this Position Statement includes information about all relevant technologies, it is possible that new technologies will emerge in time. Should this happen the general principles of this Position Statement should apply prior to any revisions being carried out.

NOTES

The Chilterns Conservation Board has the statutory duty² to pursue the following two purposes:

- a) to conserve and enhance the natural beauty of the AONB; and
- b) to increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board shall seek to foster the economic and social well-being of people living in the AONB.

This is one of a series of position statements to be published by the Board which help to expand on the Board's policies within the Chilterns AONB Management Plan or explain the Board's approach to new and emerging issues.

Further information and advice is contained in the following: The Chilterns Buildings Design Guide and the associated supplementary technical notes on local building materials, the Environmental Guidelines for the Management of Highways in the Chilterns and The Making of the Chilterns Landscape. All of these can be found on the Board's website.

The Board is comprised of members nominated by the local authorities, elected parish council appointees and individuals appointed by the Secretary of State. The Board, formed in December 2004, is the only organisation that looks after the AONB as a whole.

The Chilterns AONB was designated in 1965 and extended in area in 1990. It occupies 833 square kilometres and is a landscape of equal importance to National Parks such as Snowdonia and the Lake District.

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² Section 87, Countryside and Rights of Way Act 2000

Item 12 **Report on Defra Green Paper
on Biodiversity Offsetting**

Author: Kath Daly Countryside Officer
 Colin White Planning Officer
 Neil Jackson Conservation and Landscape Officer

Summary: Defra has published a Green Paper on Biodiversity offsetting in England and is consulting on options, including whether or not a scheme should be mandatory. Biodiversity offsetting would require developers to invest in a biodiversity project (the offset) to compensate for any environmental damage it causes.

Purpose of the Report: To inform members about the Green paper and seeks views on the key issues for the consultation response.

Background

1. Defra describes biodiversity offsets as ‘conservation activities that are designed to give biodiversity gain to compensate for residual losses arising from development. Biodiversity offsets must demonstrate measurable outcomes that are sustained over time.’
2. The Natural Environment White Paper published in July 2011 announced the intention to work with local planning authorities and their partners to test biodiversity offsetting in pilot areas over 2 years. Although the offsetting pilots are not due to be completed until April 2014, this Government has published a Green Paper on offsetting scheme options for England – the deadline for responses is 7th November.
3. The Government are considering Biodiversity Offsetting as a means to stimulate the economy by encouraging development although it may, directly, cause environmental damage. In such cases the developer could offset that damage by investing in a biodiversity project elsewhere. They believe it can offer savings to developers (through a quicker, cheaper, simpler and more certain planning system) and potential net gains to biodiversity.

https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting

4. Current ‘compensation’ through Section 106 and CIL tends to focus on affordable housing and infrastructure with limited biodiversity benefit.
5. ‘Residual losses’ are those which cannot be avoided or mitigated, following the mitigation hierarchy. The mitigation hierarchy is a policy widely embedded in environmental legislation which states that harm

should first be avoided, for example by locating development elsewhere. Where this is not possible the impacts should be mitigated, for example, through the design of the development, Finally any residual impacts should be compensated for by restoring or recreating habitats elsewhere.

6. The Secretary of State, in his foreword, states that the twin challenges of growing the economy and improving the natural environment provide the impetus for the biodiversity offsetting options articulated in the Green Paper. The Government's stated preference is for a voluntary scheme which gives the developer the choice of whether or not to use offsetting.
7. In simplistic terms the government is aiming to make sure that a development cannot be prevented because of Great Crested Newts. Critics are calling it a "licence to trash".

The proposals

8. The Green paper states that the Government will only introduce an offsetting system if it is satisfied that it will:
 - Enable the planning system to be quicker, cheaper and more certain for developers in relation to biodiversity requirements.
 - Achieve a net gain for biodiversity.
 - Avoid additional costs to business.
9. A standard metric (measure) is proposed which quantifies the value of habitats on the basis of distinctiveness, quality and area. The metric is used to calculate impacts of development and the number of biodiversity units needed to compensate for those impacts.
10. The current proposals concentrate on habitat, have a limited view of 'ecosystem services' and do not take account of landscape or public enjoyment and health benefits of existing countryside or green space.
11. Within the scheme, developers would use the standard metrics to calculate the value of biodiversity loss they could not avoid or mitigate. They would then work with 'offsetting providers' to purchase an offset equal to or greater than the loss. An example might be where a housing development led to the loss of lowland pasture. A suitable offset might be to re-create or enhance management of an existing area of grassland so that the final area of 'habitat value' represents a net gain to biodiversity.
12. The Green Paper asks for views on how much choice should be given to developers on whether or not to use offsetting, on the use of thresholds based on the size of project (number of housing units) and on offset location.

13. The Green Paper recognises that some habitats – including ancient woodland – are impossible to re-create and that any development damaging these habitats leads to an irreversible loss. It suggests, however, that offsetting could, nonetheless, still prove useful in relation to such habitats, ‘as it could enable compensation to be provided more quickly and cheaply than currently happens.’
14. The Paper suggests that the protected status of designated areas will remain but much ancient woodland, for example, is not currently protected. In relation to European protected species it is proposed that offsets could still be used but would have to be species specific, so for example an impact on great crested newts could only be offset by a project benefiting great crested newts elsewhere.

Commentary on proposals – key points

15. Depending upon the circumstances biodiversity offsetting potentially offers a number benefits and it is proposed that the Board welcomes the approach in principle, whilst emphasising that it is imperative that the principle of securing a net gain in biodiversity is adhered to. As the Secretary of State acknowledges, the success or failure of the scheme will depend ultimately upon the approach to implementation, and there are many specifics to be agreed and clarified in order for the Board to offer its support to the scheme. Above all the mitigation hierarchy must work which means avoiding damaging impacts and not simply selecting a mitigation option.
16. One of the most significant potential benefits of the approach is in securing compensation for residual impacts on habitat outside of designated sites – and ensuring that these are appropriately managed over the longer term. At present many such residual impacts do not in practice get properly addressed. In other cases, planning authorities do manage to put together a package of compensation but it can be a time-consuming and protracted process. The availability of a transparent and accepted approach to offsetting would in such situations be potentially very useful.
17. There are however many potential pitfalls and dilemmas. In particular, the risk that the introduction of offsetting is used in practice as a way around the mitigation hierarchy or to allow unsatisfactory development to proceed, and the risk of encouraging the belief that you can always replace an existing habitat, or of exaggerating the benefits of an offsetting scheme. It is also important to recognise that offsetting schemes will only be as good as the survey data available.
18. It is difficult to see how the Government’s preferred option of a fully permissive (voluntary) approach would deliver any additional benefit to biodiversity when compared to the status quo. This approach would mean that developers could choose whether or not to use the offsetting metric and to choose the means of securing compensation.

19. It is recommended that the Board supports a uniform approach, with developments exceeding a certain threshold being required to use the offsetting approach. Further consideration is needed regarding how the thresholds are defined, as basing it purely on the number of households in the development is unlikely to be satisfactory.
20. The Green paper proposes limits on the location of offsets, recognising the risk that allowing offsets anywhere in England leading to a net loss in some areas of the country. An essential principle is that the offsetting must take place as close as possible to where the damage occurs. For example, investing in the conservation of a tropical rainforest or Scottish peat bog are not acceptable offsets for loss of woodland in the Chilterns.
21. Within most of the AONB, areas of 'Biodiversity Opportunity' are already identified which could sensibly be used as a focus for delivery of biodiversity offsets. The Board needs to work closely with local planning authorities to set local priorities and policies. The detail of the final proposals will need to offer sufficient recognition and protection of areas of local distinctiveness, such as AONBs, and linear and linking habitat (e.g. hedges, field margins, sunken lanes, chalk streams).
22. Recent experience of High Speed 2, which purports to offset environmental damage, shows how flimsy this approach can be. HS2 Ltd has not sought to avoid many of the damaging impacts and simply proposes relatively modest offsetting. For example, the loss of irreplaceable ancient woodland will be offset by limited tree planting nearby, much of which is on unsuitable sites. Developers will have taken note of this precedent and, inevitably, in the pursuit of profit will only willingly invest in offsetting if it unlocks planning approval on sites where it would have previously or otherwise have been refused. With care, and in the right circumstances, it might be made to work. The detail of the scheme, its enforcement and long term monitoring will be vital. Intermediaries such as The Environment Bank are offering themselves as bodies which can help achieve this.

Recommendations

- 1. The Board notes and comments on the content of the report.**
- 2. The Board supports the introduction of a biodiversity offsetting scheme subject to a number of caveats, not least the principle that the scheme commits to delivering a net gain in biodiversity.**
- 3. The Board recommends a uniform approach rather than a fully permissive approach.**
- 4. The Board considers what role it might play in relation to Biodiversity Offsetting.**

Community Forum Meetings

4. In late February 2013 HS2 Ltd unilaterally suspended the Community Forum meetings claiming that they had received legal advice that, as a government body they could not hold public meetings in the purdah period prior to the county council elections. Despite that not being the case HS2 Ltd refused requests to continue to hold forum meetings on a two monthly cycle and especially during the period that the draft Environment Statement was consulted on.
5. HS2 Ltd recently held a final round of Community Forum meetings in September. They do not believe it would be appropriate to hold them once the Hybrid Bill is lodged (anticipated by the end of December). Thereafter the Community Engagement Team is being redeployed to manage the petitioning process. A new community engagement officer will be employed but there is, as yet no clarity on their role in the absence of community fora.

Draft Environment Statement

6. The draft Environment Statement was published for consultation ending in mid-July. It was, by general consensus, light on detail, poorly presented and incomplete. It also included new features which had not been raised at any time beforehand. On many important and sensitive issues, such as noise, the document contained very little and simply stated that the final ES would contain all the necessary information.
7. The Board submitted a full response running to over 100 pages. In the event it was prepared in-house by staff and Board members with no use of consultants. There was also extensive sharing of responses between various groups which helped to ensure nothing was overlooked. It can only be assumed that HS2 Ltd will produce a very different and much fuller final ES, and that the draft ES did little more than help alert them to areas of concern to the public.
8. The final ES is now expected to be published before the end of November. This will mean that the consultation period will include Christmas and New Year. MPs are being lobbied to ensure that either the consultation period is re-scheduled to begin in the New Year or for it to be extended to compensate for the loss of time over the holiday period. It is expected that the only printed copies available to the public are likely to be in public libraries.
9. The Conserve the Chilterns and Countryside Group commissioned consultants, Peter Brett Associates, to prepare an SEA on a tunnel to demonstrate the environmental benefits it would provide compared to what is proposed. That work was guided and supported by Ray Payne with additional help from staff.

Disposal of Spoil

10. HS2 officials have publicly stated that the Environmental Statement will include the “sustainable placement of surplus excavated material” arising from the construction of the route in the Chilterns on a site at Hunts Hill Farm, which lies between South Heath and Kings Ash near Wendover. This will include 800,000 cubic metres of spoil. Although the design of the route has not changed since late 2011 and the volumes of spoil have, therefore, been known for two years, HS2 Ltd has only just been announced this proposal, which was not mentioned in the draft Environmental Statement published only in June 2013. They claim it is to reduce the number of HGV movements required to remove the spoil to another location. The general view is that it is no more than a cost saving measure and, whilst it may provide a short term environmental benefit, it would mean a permanent despoliation of the landscape and significant change to the natural landform. It, yet again, demonstrates the low weighting being given by Government to the statutory duty to give due regard to the special qualities of the AONB.

Judicial Reviews Appeal

9. The Appeal on whether an SEA should have been undertaken was unsuccessful but only marginally, and leave was granted to appeal to the Supreme Court which is due to be heard on 15th October. The three Appeal Court judges agreed with the appellants (HS2 Action Alliance) on 3 counts and on the fourth voted 2-1 against. The judge who voted in favour of granting the appeal submitted his own 25 page report condemning strongly the failure by HS2 Ltd to prepare an SEA.

External Benefits of a Tunnel

10. In January 2012 the Secretary of State announced the current route proclaiming that the Chilterns would be protected by having a longer tunnel leaving only 1.4 miles of the route visible in the Chilterns. That longer tunnel now emerges at Mantles Wood near Hyde Heath at an elevation of over 500 feet in the centre of the AONB and middle of an ancient woodland, leaving claims of protecting the AONB looking unconvincing. According to the Board's own calculations the length of visible route remains nearly 4 miles (i.e. that on embankment, viaduct surface and cuttings less than 8 metres deep).
11. It is the view of the Board and others that, far from protecting the Chilterns AONB, the environmental and social impacts of the length of railway not in tunnel is considerable, including the effects of constructing a so called green tunnel. Therefore, a full length bored tunnel is the best solution.
12. To support this case in 2012 campaign groups paid for consultants to prepare a, technical feasibility report and cost estimate of a longer tunnel (with a 500 metre intervention gap) which demonstrated that the construction cost of such a tunnel would not be significantly more than the current proposal. HS2 Ltd analysed the case but rejected it claiming that it would cost approximately £400 million more. This is strongly disputed but HS2 Ltd refused to disclose their calculations and attempts to discuss the details proved fruitless.

13. A second report has been commissioned by Conserve the Chilterns and Countryside Group from Peter Brett Associates on the case for a full length bored tunnel based on calculating the cost to society, and not just the construction cost to the Department for Transport. This is described as valuing the non-market benefits.
14. On 10th September HS2 Ltd officials confirmed that the Environment Statement to accompany the Hybrid Bill will not include a longer tunnel. The report making the case is, therefore, intended to be presented to the parliamentary select committee (petitioning stage) seeking their support.
15. The full report was presented to the Executive Committee for endorsement (Appendix 1 - only circulated in electronic form)
16. Although the Supreme Court ruling (if it accepts the appeal) may significantly alter the time table by extending it for a year or so whilst an SEA is prepared, for the time-being it has to be assumed that the Hybrid Bill will be lodged by the end of 2013. In which case those seeking changes need to collaborate to select those amendments most widely supported which would bring maximum benefits. General advice is that it is best to identify a lead petitioner and for others to support that person or organisation, rather than several petitioners to ask for similar changes.
17. The only prospect of a longer tunnel being built is if it supported by the HS2 Select Committee. The Board needs to decide whether to be a lead or supporting petitioner. To some extent that depends upon whether a local authority is prepared to petition for a tunnel and the extent of commitment required if the Board is to be the lead petitioner. The range of costs can be very wide depending upon the extent to which legal support is brought in. It is not uncommon for the government and petitioners to be represented by QCs. That would involve a level of expenditure the Board cannot contemplate.
18. The reality is that the Board should consider taking a leading (if not the lead) role in petitioning for a tunnel and the case to be prepared and presented by staff and Board members (perhaps with a modicum of legal advice and training).
19. If the case for a longer tunnel is supported there is the related argument that the current alignment should also be adjusted as there is no need to go up and down the side of the Misbourne Valley. Given that the Secretary of State recently said, "it is not about speed" there is an argument that the design speed of the line should be lowered for the tunnelled section giving further flexibility over the alignment. This would provide the opportunity to move the line further to the west of Wendover, which would then be less affected by the noise of trains as they enter and emerge from the tunnel. (There are many locations where the sub optimal alignment based environmental and social considerations has been chosen simply to accommodate the high line speed (up to 400 kph).

Recommendations

- 1. To endorse the report prepared by Peter Brett Associates on the non-market benefits of a longer tunnel**
- 2. To make the case for a re-alignment of a tunnel further to the west of Wendover and for a lower line speed to facilitate such a change.**
- 3. The Board should take a leading role (in association with others) to petition for a longer bored tunnel.**
- 4. To petition against the plan to dump of 800,000 cubic metres of spoil in the AONB.**

Item 14 Future of the Chilterns LEADER Programme

Author: Steve Rodrick Chief Officer

Summary: The EU funded LEADER programme has delivered nearly £1.5 m of grant to rural businesses in the Chilterns in the last 4 years. It will end in December 2013 to be followed by a transition year before a new LEADER programme is established in early 2015.

Purpose of Paper: To inform members of the future of the LEADER programme.

n.b A presentation will be given by Nick Phillips, the manager for the Chilterns LEADER programme.

Background

1. The LEADER programme is supported by EU funds provided from the Common Agricultural Policy (CAP) through the Rural Development Programme for England (RDPE). The Chilterns programme covers all of the AONB and a small number of the market towns such as Tring and Princes Risborough. Because of a population cap it was not possible to include all the towns.
2. The Local Development Strategy, on which the programme bid was based, was prepared with significant input from members and officers of the Board (Mike Fox, Shirley Judges and Steve Rodrick) who have continued to serve on the Local Action Group which considers and approves grant awards of up to £50,000.
3. Since 2009 grant aid of approximately £1.5 million has been awarded to local businesses. The priority areas have been: adding value to farming and forestry; tourism, business efficiency and community facilities. The average grant award has been £27,000.
4. The programme has been managed jointly with the Aylesbury Vale and Milton Keynes (AVMK) programme by Nick Phillips who is employed by Bucks Business First, formerly Ngage Solutions Ltd, based at Saunderton near Princes Risborough.
5. The programme is due to end in December 2013. As the re-negotiation of the Common Agricultural Policy is behind schedule it will not be possible to re-establish a LEADER programme until early 2015. In recognition of this unfortunate gap DEFRA has provided funding of £41,000 (for the Chilterns programme) to cover the transition costs during 2014. Together with a similar

sum for the AVMK programme there are sufficient funds to continue to employ Nick Phillips (and Hannah Sutcliffe, the assistant officer,) on a part time basis for the next 12 months. During this time his priorities will be to prepare the Local Development Strategy for the next programme and help prepare applications to avoid a hiatus in early 2015 when the new funds become available.

6. It seems highly likely that the new LEADER programme will still be based on the Chilterns and not the county or Local Enterprise Partnership area. It is also unlikely there will be a population cap coverage will be restricted to rural areas and smaller market towns. This should allow much of south Bucks and several of the market towns, such as Chesham, to be included.
7. As with the current programme the Board should be prepared to commit significant amounts of staff and member time to secure and shape the next LEADER programme. It is also vital that the momentum built up over the last four years is not lost during the transition year. To that end it is important to keep sending out the message that there will be a new programme in early 2015. The next 12 months provides an opportunity to develop major project applications ready for submission in early 2015. Experience has shown that building related projects often take a year or more to get to the point they are ready to submit with a reasonable chance of success.

Recommendations

1. **To note the success of the current LEADER programme**
2. **To offer officer and member time during to support the development of the LEADER programme for 2015 onwards.**

Item 15 **The Landscape Declaration**
- by National Parks and AONBs

Author: Steve Rodrick Chief Officer

Summary: A declaration was prepared at the recent National Park conference urging government to give a higher priority to the importance of landscape in general, including Areas of Outstanding Natural Beauty.

Purpose of Report: To inform members of this recent initiative and invite the Board to endorse the declaration.

Background

1. The landscape of National Parks and Areas of Outstanding Natural Beauty of is equal national importance. This is not as well known as it should be. It is, however, recognised in the planning system.
2. It has been a concern for some time that, despite this equal importance and very similar statutory purposes, the National Parks and AONBs have not worked as closely as is either desirable or sensible. Both designations are facing a similar scale of funding cuts and similar pressures. It makes sense for the two designations to work much more closely together. Whilst this has been recognised by the National Association for AONBs for some time, not every effort to work more closely has been welcomed by the Association for National Park Authorities. This is not to say there has not been some effective working at individual AONB and National Park level.
3. In recent months there have been some welcome signs of progress. The annual NAAONB conference held in Ipswich in July was co-sponsored by the Broads Authority. Tom Surrey, the new DEFRA Deputy Director for Landscape and Outdoor Recreation with responsibility for both designations has visited many parks and AONBs including the Chilterns. He recognises the benefit of closer collaboration.
4. More recently several AONB representatives, including the Chief Officer, attended the annual National Park conference in Yorkshire. It was noticeable that there were many mentions, in the same breath, of National Parks and AONBs.
5. A significant outcome of the conference was a Landscape Declaration, (Appendix 1). This addresses the importance of landscape in general, with a specific recognition of the role of protected landscapes and no distinction between National Parks and AONBs.

6. The emphasis on landscape in general is welcome and timely as it seems Government commitment to protect our finest landscapes is declining (there is no better example than HS2. It must be assumed that if protected landscapes are under threat then unprotected landscapes are facing more challenges than ever.
7. The Declaration in itself has no weight, but if supported by the National Parks and AONBs then it has a better chance of being taken seriously. For this reason the Board is being asked to consider and endorse the Declaration.

Recommendation

1. **To endorse the Landscape Declaration**

The Landscape Declaration

Made at the UK National Parks conference, North York Moors, September 2013

Landscapes define people and nations. They are constantly evolving and are valued more than ever. A growing national and international population, climate change and globalisation mean that without appropriate action the distinctiveness of landscapes will be eroded more rapidly over the next decade.

Landscape means an area, as perceived by people, the character of which is the result of the action and interaction of natural and/or human factors.

An appreciation and understanding of landscape encompasses perceptions from all our senses in reaction to a particular place, together with the memories it evokes and its wider natural and historical associations.

We believe that:

- Landscapes should be celebrated for their contemporary value.
- Landscapes matter to individuals and communities. They are homes to return to, places of escape, places of pride. They bring belonging and sharing of experience.
- People should be involved in decisions which affect landscapes they have a stake in, especially those they live in.
- Wildlife and cultural heritage are essential elements of landscape and central to the sense of place.
- The aesthetic and spiritual qualities of landscapes should be valued alongside the economic and material ones.
- Landscapes have huge economic value from their aesthetic qualities as well as their productive ones.
- Retaining and enhancing the distinctiveness of places should be an aim of policy across all landscapes.
- Maintaining tranquil and 'wild' places is increasingly important as our population grows.
- Some change in landscapes is in general both inevitable and desirable – but a good appreciation of what is there now is important before undertaking change. The nature and speed of change and the capacity to accommodate it are critical factors in its desirability.

We believe that Protected Landscapes should play their part in promoting the importance of landscape generally.

We believe that the following areas need further thought:

- How to translate Landscape Character Assessments into a form which can be readily used in decision taking.
- How to identify positive change in landscape, for its own sake and from the productive industries within it.

- Whether such positive changes can be actively planned for or should be the result of public participation in individual decisions.
- Finding new ways to help people understand and enjoy landscape.
- Management of the coast - interface of sea and land - needs better integration.

We variously undertake to:

- Use the breadth of understanding that landscape appreciation brings to inform our decision taking on matters including recreation, forestry and planning.
- Strive harder to make special landscapes and seascapes relevant to everyone.
- Manage land positively to enable tourism to operate with minimum impact
- Give greater emphasis to landscape quality and good design in decision making
- Ensure that our landscapes become richer in wildlife.
- Consider how greater economic benefit and employment can be achieved from special landscapes without harming the things that make them special, and act on these conclusions.
- Develop our work on landscape evaluation.
- Share our understanding and experience with all other landscapes including those valued locally.
- Use our landscapes as a means of engaging people with all aspects of the natural and cultural environment
- Ask our Governments to consider carefully the importance of the settings of our Protected Landscapes.

We urge our Governments to help promote a renewed awareness of the value of landscape in policy and decision making which affects places.

6. The Board has not attended the Hertfordshire Show for a few years as this two day event was too demanding of staff time.
7. As the primary value of attending these shows is to enhance public profile of the Board and AONB there is a question mark over whether it is either effective or whether the Board needs to have a presence every year. This has to be seen in the context of other profile enhancing activity and the extensive amount of networking that takes place in any event. A further consideration is the range of other events which the Board attends, including our own Countryside Festival.
8. The Board has a number of options
 1. Carry on as at present.
 2. Attend every two or three years, but not annually.
 3. Share with another organisation providing it reduces the time and cost.
 4. Suspend attendance for the foreseeable future.
 5. A limited number of staff and members attend, without a stand, to network.
9. The declining presence of other countryside organisations suggests they have decided that attending these events is not the best use of their staff time and funds.
10. The county shows still attract tens of thousands of visitors and they are the premier countryside event in each county. There are no better events to attend if it is thought attendance at this type of event is important to the Board.

Recommendation

1. **The Board should suspend its attendance at county shows for 2014 and reconsider whether to resume its attendance in 12 months' time.**