



**Chilterns Area of Outstanding Natural Beauty
Management Plan
2014 - 2019**

**Environmental Report - Annex A
Responses to Scoping Report Consultation Comments
April 2014**

The Chilterns Conservation Board
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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	General		Hambleton Parish Council has no comments	Noted.

Council			to make.	
Harlington Parish Council	General		Harlington Parish Council has no comments to make and feels the report is acceptable as it is.	Welcomed and noted.
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	Welcomed and noted.

			think that the pressures on farming, and the consequent effects on the AONB, are well expressed.	
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	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.

			<p>Totternhoe to the west of Dunstable.</p>	
<p>Sonning Common Parish Council</p>	<p>General</p>		<p>By the nature of LPAs Core Strategies and new Local Plans, there will need to be some 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</p>	<p>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.</p>

			develop, it would seem a good idea to consider the risks and to designate some new AONB land to refresh the overall stock? It 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 this sentence if other scenically attractive areas are looked at as part of any boundary review?	Comment noted – the sentence includes text 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</i>	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.

			<i>outcome for the AONB, including adding the value of the Conservation Board's contribution.</i> " The text goes on to describe 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	Comments noted and issue will be addressed within the Management Plan itself.

			impact on the AONB itself. The Local Character Assessments: the South Bedfordshire LCA, the Mid Bedfordshire LCA 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	Comments noted though no change is proposed. To include all species and habitats

			important rarities. The fish could do with a mention if only as an essential food source.	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	Comments noted.

			repaired, still with no success.	
English Heritage	3.2.40	19	Although there is a currently a lack of data on the condition of Grade II listed buildings and 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.	Agree with comment, therefore suggest adding 'in connection with Grade I and II* listed 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 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.	Agree with the thrust of the comments and suggested changes. No change is needed in 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.’
Environment Agency, Hatfield	3.2.46	21	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.	Agree with comments, therefore add the following to read: <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	Comments noted. It is not considered necessary to go into the level of detail

		<p>resources. As detailed in our comments for the soil section above, the nature of the underlying geology of the AONB means that 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</p>	<p>suggested (e.g. the AONB is not in the Bedford upper Ouse chalk groundwater body). However, suggest that the paragraph is 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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			are designated as <i>Source Protection Zones</i> (SPZs), with SPZ1 being the highest risk area (groundwater within SPZ1 will reach the 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 potential . 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	Comment noted. This issue is considered to have been addressed in the 'lack of

			Stewardship scheme and uncertainty surrounding this should be included.	management' element of the 'landscape' section on page 23.
Hertfordshire County Council	Table 1	24	The key environmental issues and problems 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.	Comment noted. This issue is considered to 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	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.

			AONB boundaries, the issues identified, including those above, are likely to have impacts on ecological value and on fish 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	Comments noted, information resources will be assessed. The uncertainty recorded arises from possible impacts due to potential pressure on resources from increased access

		<p>those living and working in the AONB” and also when compared with Objective 12 “To increase awareness, understanding and 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</p>	<p>to the countryside. No change is proposed.</p>
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			study; http://www.rspb.org.uk/Images/naturalhealth_tcm9-161955.pdf).	
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:-	Comments noted. No change is proposed as the objective and assessment criteria as currently drafted are considered to address the

			<i>"To conserve and enhance the built environment by promoting (i) sustainable construction methods and (ii) design features mitigating adverse impacts of climate change."</i> and add under right hand column headed Assessment Criteria <i>"Enhance local distinctiveness"</i> .	issues raised, alongside text that will be in the Management Plan itself.
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	Comments noted, no change proposed as text as drafted is considered to address the issue raised.

			local events (for example).	
Central Bedfordshire Council	Table 4	30	Additional objective 13 – The proposed SEA framework does not address the issue of 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?	Comments noted, no change proposed as text as drafted (Objectives 2, 4, 7 and 8 and 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

<p>Sheila Pilkington, Markyate</p>	<p>General</p>	<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. 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? 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. 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. 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).	<p>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:</p> <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.