

THAMES BASIN HEATHS SPA
HAMPSHIRE COUNTY COUNCIL CONSULTATION RESPONSE TO
DRAFT INTERIM STRATEGIC DELIVERY PLAN

(To be read in conjunction with separate HCC paper)

General Comment: The Introduction should explain the significance of the grey-tinted boxes – presumably these are intended as policies.

Question 1

Do you agree or disagree that consistent a approach to the protection of the Thames Basin Heaths across the authorities affected is needed?

Response Strongly Agree

Comment

Question 2

Do you think that the timescale for the Interim Strategic Delivery Plan (ISDP) - to 2016 - is

Response About Right

Comment Subject to timely review so that a longer term replacement is in place and agreed before 2017.

Question 3

Do you think the ISDP should apply to

Response All flats and houses

Comment If certain categories and sizes of dwellings are excluded from paying the tariff, then developers will seek to avoid or reduce their financial liability by focusing on building these. This means that in areas like Rushmoor, where there is a known shortage of quality ‘executive’ family housing, developers will be encouraged to build flats rather than houses and to restrict car parking spaces rather than meet local needs.

Re ISDP 1 (b), line 3: Residential care homes in this category whose residents keep pets other than cats and dogs should not be required to contribute (e.g. cage birds and gerbils do not harm the SPA!)

ISDP 2, lines 5/6 : for greater clarity, change “subject to their incorporation of” to “if they incorporate”.

Question 4

Should the ISDP set a zone of 400m-5km, measured as the crow flies, where residential development is only allowed if measures to avoid impact on the SPA are provided?

Response Yes.

Comment Support the principal of an outer boundary of 5 km.

Particularly support the last paragraph of ISDP3, which refers to the need for flexibility in the inner boundary where there are impenetrable barriers such as the Basingstoke Canal and motorways. The policy should clarify who will define the boundaries and how it should be done. LDDs should be the mechanism for this.

Re ISDP 4, para.4: Concerned about discounting Mole Valley District Council as, if you allow exceptions at this stage, the whole process will then be open to challenge in the future.

Question 5

Do you support the principle that a network of suitable alternative natural green space (SANG) should be developed across the affected local authorities to provide alternative open space for people to use instead of the SPA?

Response Yes

Comment We agree that developing increasing opportunities for green space access within a strategic and co-ordinated cross boundary approach is one of the key mechanisms to prevent damage to the SPA. It is important that SANG land is not seen in isolation and that resources are in place to ensure that, where possible, it is linked strategically.

The ISDP is sensible when it talks about the need for SANG land to fit into broad green infrastructure network (para. 8.2.11.) The success of the ISDP is dependent upon the sustained expansion of the of this green infrastructure network. The ISDP should be aiming to deliver net increase over the current provision, otherwise there is nothing to stop existing sites closing or use of existing sites declining due to decreasing management input.

We have considerable concerns that the role of the existing green infrastructure network has been greatly underestimated. The over prescriptive approach to SANG site quality requirements (ISDP 8) will lead to excessive spending on limited sites but will do nothing and may even exacerbate the continued decline in the rest of the network and so lead to increased pressure on the SPA not less. See Question 11.

The delivery mechanism and costings in the ISDP are flawed as they are limited just to new sites or increasing use of existing sites. They include no provision to prevent closure or prevent declining use of existing sites. Neither do they address small scale but immediate local provision e.g. footpaths accessible from housing areas that obviates the need to travel to larger SANG sites.

The carrying capacity of existing sites is not taken into account.

Question 6

The ISDP proposes that developments of fewer than 10 dwellings do not need to be located close to SANG land, because their residents' impact on the SPA - when considered alone - is not significant; but that development of 10 dwellings or more should be located within 2km of a SANG because they - alone - could have a significant impact on the SPA.

Response Tend to agree

Comment If the many small developments of under 10 dwellings had to be close to SANG land this would not only present difficulties finding sufficient land to provide these SANGS, but it would also create pressure to provide a plethora of small SANG sites spread across the zone of influence. The maintenance requirements of many small dispersed SANG sites could be large and costs per hectare increased. The dispersed visitor pressure created by many small developments would be better served by an overall green infrastructure network with fewer larger SANG sites set within a network of linking and circular routes and green corridors.

The distance restrictions on developments of 10 or more could be less onerous as it is unlikely that a development of 10 houses alone would be significant if a SANG was 2.1km away but not significant if it was 1.9km. Factors such as availability of local footpaths or non SANG green space will be more significant. We believe more emphasis should be placed on the overall green space provision across the SPA rather than being too prescriptive on individual developments.

Question 7

The ISDP proposes that large areas of SANG land (40ha) should be provided near to the most pressured parts of the SPA to divert visitors away from the SPA. Do you:

Response Tend to agree

Comment However, whilst, we agree with the logic behind this proposal, we can see it being difficult to provide such sites within 2km (as outlined in ISDP 5) - again this very prescriptive approach may create problems in implementation.

Question 8

How should pressured parts of the SPA be defined?

Response Those that have low numbers of protected birds due to visitor disturbance

Comment The purpose of designating the SPA is to support the breeding birds at optimum numbers, not to provide quiet places for people to walk

Question 9

Do you think that the minimum sizes proposed for SANG land (2ha SANG, 15ha 'parent site' - policy ISDP7 page 29) are

Response About right

Comment Natural England in their Accessible Natural Green space model refers to 2ha sites being within 300m of each home, 20ha sites within 2km, 100ha sites within 5km. This would suggest that parent sites need to be of 20ha and there is need for a number of 100ha sites within the plan. These standards will be difficult to meet but need to be referred to in the ISDP even if to say why rejected.

From a policy angle this does not meet the Green Infrastructure ideal. It needs to be more flexible and needs to be delegated to the Project team – then decisions can be justified back to the board. The policy also might limit funding – to make the network actually work it is necessary to fund the whole network not just selected sections. The exclusive focus on SANGs rather than the wider GI is too narrow.

Question 10

Do you agree or disagree that people will travel up to 2km to access SANG land?

Response Tend to disagree.

Comment Again a simplistic approach has weaknesses. People will travel further than 2km for a good quality site or where no nearer alternative exists. See comment on previous question.

Question 11

Do you think that policy ISDP8 (page 30) sets out a comprehensive framework for assessing SANG quality?

Response Strongly disagree

Comment This highly prescriptive approach to SANGS is not helpful. The ISDP refers to development of linked green infrastructure but, by being so detailed, it will exclude many sites and

routes that provide this green infrastructure. Again, SANGS should not be seen in isolation but as an array of sites.

We do not agree that many of the “essential qualities” are essential for all sites. They are useful as guide but other qualities or features of a site may be equally attractive to visitors. By including so many “essential” features within policy this will limit those site that can be considered for funding through the ISDP or steer funding to the provision of unnecessary features. Many of described features are qualitative and so not enforceable. For example, requiring a car park for sites that are larger than 4 hectares is too draconian. It will eliminate potential SANGs that are currently providing useful recreational needs for local people, where the requirement for a car park is neither practical nor sustainable or not always needed.

The policy should refer to Natural England’s selection criteria as a guide but the process of selection needs to be more open to allow funding to be more flexible. This would allow funding to be available for wider green infrastructure projects, such as linkage routes, rights of way and smaller sites.

Question 12

Is having a jointly funded cross-SPA access management Project Team important to help manage and reduce the impact of recreation?

Response Yes, but smaller and not in the format as outlined.

Comment A small central team is needed to ensure that the strategic provision of SANGS takes place, that they are maintained to agreed standards, to co-ordinate activities, to allocate and monitor resources and to monitor, review and report the success of the ISDP. A centralised body is also best suited to professional (as distinct from public) communication between the various bodies that manage the SPA, SANGS and wider green infrastructure. It could usefully organise cross boundary surveys and contracts or relevant training courses, seminars, disseminating best practice etc.

The three year initial period is too short for the team to be fully effective. For example, set up and establishing effective working relationships with the many partners could take considerable time. Community engagement should also be long-term and continuous, to cover the whole life of the ISDP. The project team should be in place for at least five years (subject to the annual review) rather than the three years proposed, up to the time of the first five yearly review.

As well as establishing a limited central team, it is important to complement this by building on existing organisations and services., so that they can cope with the added visitor pressures and undertake additional responsibilities and programmes. All SPA sites that are open to public access already have their own expert ranger/warden service who know their site well, and most access management can be best delivered at site level by existing ranger warden services, given adequate resources. This would also ensure integration with other initiatives. Indeed, introducing another layer of organisation would only lead to duplication, confusion, extra costs or even conflict.

The Blackwater Valley Countryside Partnership, for example, already organises a highly successful cross boundary volunteer programme and network that works within 9 of the 13 planning authority areas that fall in the SPA Zone of Influence. This programme is only limited by funding and staff time but is based on years of publicity and refining expertise. It would be much easier to expand the existing arrangements than start from scratch.

Question 13

Should the focus of shared, cross-SPA access management be on (please tick as many as you want):

Response Off site education and publicity

On-site education – e.g. leaflets, interpretation boards

Comment On-site work whether it be educational activities, increased ranger presence or management of access will be best served by the existing ranger services. (See Question 12)

Question 14

Do you think a standard tariff - applied across all the local authority areas affected by the SPA - is a fair and practical way of allowing developers to pay for measures to avoid impact on the SPA?

Response Yes

Comment For equality and simplicity this makes sense

Question 15

On collection of tariff

Response The tariff should be collected locally.

Comment It should either then pass in total into a central pot which distributes the funds equitably or, if retained locally, should be passed in part for use centrally (e.g. some element of joint spending will be required where cross-boundary solutions are the most appropriate, as well as on the central team.) There should be no question of all the funds being retained locally. The mechanism for achieving this will need to be decided.

Question 16

On variability of contributions

Response No preference

Comment Could be linked to floor space or number of bed spaces rather than bedrooms.

Question 17

Do you think that a standard tariff should be calculated on the basis of (please tick as many as you want):

Response SANG maintenance costs for 80 years, both for maintenance of basic provision and for the maintenance of improvements.

PR and education costs over 80 years

Access management staff costs over 80 years

Land acquisition costs

Capital cost for improvement works

Monitoring and survey costs

Comment All elements are necessary.

Tariffs should be regularly updated to allow for inflation. What happens after 80 years?

Question 18

Do you think that policy ISDP12 (page 40) sets out a comprehensive framework for monitoring?

Response No

Comment There is a need to monitor both public and privately owned SANGS to ensure the agreed works programme has been implemented and maintenance standards are being met to keep the a site in good condition.

It is unnecessary to monitor how many visitors are diverted away from SPA: rather, the key indicator should be about the success of breeding birds which is a combination of both habitat and access management. MOD land could be used as a comparator.

Visitor surveys should not be a proxy measure. However, they can be useful and should include:

Reasons why they come

Where else they visit

Behaviour when they are there

Awareness of SPA issues

The value they put on the site

Monitoring needs to be carried out over the long term to really determine how effective any scheme or proposed management technique really is. Monitoring costs need to be built into commuted sums. What are the aims of the monitoring?. If numbers go up but also bird numbers increase, is this acceptable? Need a proper hypothesis, related to the current carrying capacity.

Question 19

Do you agree or disagree that all the local authorities affected by the SPA should work towards a joint plan (either a Supplementary Planning Document or Development Plan Document) addressing the Thames Basin Heaths issue?

Response

Strongly agree

Comment

Not sure how this differs from Question 1. Surely a joint plan will produce a consistent approach and a consistent approach can only be implemented with a joint plan. If the question refers to any joint plan being included within the statutory land planning system we agree as the SANG approach is reliant on land use and allocation.

Question 20

Any other comments? **Comment : Please see accompanying paper.**