

Councillor David Sparks

Summary of comments	Council's Response	Council's Further Action
<p>Queries raised at Cabinet. Appendix 1 section 1.2 - otters are rarely seen in Dudley.</p>	<p>Appendix 1 - 1.2 - Signs of otters have been recorded at a number of locations in Dudley and national guidance requires the protection of their habitat through the planning system.</p>	<p>No change.</p>
<p>Appendix 1 section 1.3 - reference to bats at Wrens Nest and Castle Hill</p>	<p>Appendix 1 - 1.3 -Text will be added to clarify the reference to bats at Wrens Nest and Castle Hill .</p>	<p>In Appendix 1 section 1.3 at the end of the paragraph "Local issues - Wrens Nest and Castle Hill Bat Populations" add "This means ensuring location and layout of development, landscaping and lighting are designed to avoid undue impacts on both feeding habitat and corridors of movement."</p>
<p>Appendix 1 section 2.1.3 - the wording "The first pair bred in Birmingham in 1943" is not a good use of words.</p>	<p>Appendix 1 - 2.1.3 -The reference to the wording on the black redstart is noted and this will be amended.</p>	<p>In paragraph 2.1.3 of Appendix 1 amend wording in line 6 to read "Black redstarts were first recorded breeding in Birmingham in 1943."</p>

Birmingham & Black Country Bat Group

Summary of comments	Council's Response	Council's Further Action
<p>Optimum times for bat survey excludes October when bats may change behaviour significantly including habitat use to take part in mating behaviour.</p>	<p>The reference to bat surveys is noted and October will be included in Table 3.</p>	<p>Amend optimum survey time for bats in Table 3 to include October under "Breeding".</p>
<p>Survey criteria insufficient in Appendix 1- should include older buildings (100+years), large garden areas or allotments; include structures such as canal bridges and tunnels. Need to be careful of modern housing with hanging tiles and decorative boarding</p>	<p>Reference is already made to large gardens and canals but allotments will be added in bullet point 3. A further bullet point will be added to refer to demolition of older buildings (100 years +) and more modern buildings.</p>	<p>Add "and allotments" after "mature gardens" in bullet point 3 on page 8 of Appendix 1 under "Information Requirements and Survey Standards". Add further bullet point to read "If demolition of older buildings, particularly those over 100 years, is proposed. Bats can also be present in newer properties, especially those with hanging tiles and hanging decorative boarding. If demolition is proposed, and one or more of the criteria listed is met, a survey of the property will be required."</p>

Hunnington Parish Council

Summary of comments	Council's Response	Council's Further Action
The documents cover very important parts of the maintenance and development of the Borough. If these concepts can be delivered they can only improve the area to the advantage of all the people who live and work in the area	Noted.	None.

Barratt West Midlands

Summary of comments	Council's Response	Council's Further Action
Para 1.5. - supports commitment to pre-application discussions.	Para 1.5 - support is noted.	None
Para 2.1.4- supports the advocated approach of recognising the need to encourage development and working with developers as "partners" with development and regeneration	Para 2.1.4 - support is noted.	None.
Para 2.4.8- support wording regarding the potential of new development to enhance biodiversity or to compensate for any loss.	Para 2.4.8 - support is noted.	None.
Para 3.1.4- include a reference to "development in appropriate cases being supported on part of a site acting as a suitable catalyst for mitigation and protection through positive management of the important nature conservation areas remaining on the site." This would be consistent with paragraphs 2.1.4 and 2.4.8 and policy DD10 of the adopted UDP.	Para 3.1.4 - this paragraph refers to ancient woodland and traditional grasslands, both finite resources, and the Council would seek to protect these wherever possible. The suggested wording would weaken the Council' stance.	Para 3.1.4 -no change
Para 3.2.7- delete last sentence as too restrictive and insert	Para 3.2.7 - it is felt that the suggested wording would	Para 3.2.7 - no change

new wording that translocation should be available as an option where "on balance it is considered to be appropriate"	be contrary to English Nature's published guidelines on translocations. The text is being amended to include "as a last resort" on the recommendation of English Nature.	
Para 4.2.2 (last bullet point) - wording not clear but same comment as 3.2.7 regarding added text.	Para 4.2.2 - as 3.2.7.	Para 4.2.2 - no change.
Para 6.4.3 - support for positive approach to development whereby there is potential to pursue suitable mitigation and habitat creation in conjunction with valuable development proposals.	Para 6.4.3 - support is noted.	None.
Chapters 3 & 6 - the Council should consider the relationship between the two sections to avoid unnecessary duplication of material. It would seem sensible that section 6 contains all the "policy" material to be found in the SPD with the preceding sections forming explanatory and informative background information.	The Council notes the comments regarding Chapters 3 and 6. However it is felt that the document is well structured and follows the format of the Adopted UDP and does not duplicate material.	None.
Recommend that the relevant UDP adopted policies are reproduced as the first appendix for ease of reference. Further, a plan identifying each of the designated sites with an explanation of the basis on which they have been designated should be considered (or a separate report with this information published and available on Council website	The reference to reproducing the relevant adopted UDP policies on nature conservation is noted. The policies are listed in section 2.4 of the document but a full text of the policies will be reproduced in an appendix of the final SPD document. The designated sites will be identified in the UDP Proposals Map which will be available in both printed form and on the Council's website.	Appendix - include the Nature Conservation policies of the adopted UDP in new Appendix 6.

Butterfly Conservation

Summary of comments	Council's Response	Council's Further Action
Para 2.1.3 - it is not just the green environments that are important but Brownfield sites, so perhaps replace the word "green" with "natural".	Para 2.1.3 - this is noted and text will be amended accordingly.	Para 2.1.3 - replace "green" with "natural".
Para 2.2.1 - also mention here that geological exposures are also good for rare and vulnerable flora and fauna.	Para 2.2.1 - this is noted and text will be amended accordingly.	Para 2.2.1 - add sentence to end of paragraph "Geological exposures are also good for rare and vulnerable flora and fauna".
Para 2.2.2 - fully support this paragraph. Good to see the acknowledgement of the biodiversity value of previously developed land.	Para 2.2.2 - support is noted.	None.

Para 2.2.4 - pleased to see the acknowledgement of the canal network as importance for biodiversity.	Para 2.2.4 - support is noted.	None.
Para 2.3.2 - support for the reference from PPS9 of the need for biodiversity protection on previously developed land.	Para 2.3.2 - support is noted.	None.
Para 2.3.3 - sentence relating to ecological survey does not make sense. BC would support something along the lines of "Ecological surveys should be undertaken prior to planning consent and not as a planning condition".	Para 2.3.3 - there is a typographical error and this will be amended to include further text from ODPM Circular 06/2005.	Para 2.3.3 - amend text to read "and that the need to ensure ecological surveys are carried out should only be left to coverage under planning conditions in exceptional circumstances".
Para 2.4.1 - strong support for the concept of stepping stones and this equally applies to brownfield habitats.	Para 2.4.1 - support is noted.	None.
Para 2.4.8 - support the enhancing of the Borough's biodiversity within development. However, it should be pointed out that in some instances compensation will not be justified, where networks of surrounding habitat and meta-population could be destroyed by the loss of one particular piece of habitat or where habitat are not readily recreated.	Para 2.4.8 - noted, amend text accordingly.	Para 2.4.8 - add text to end of paragraph to read "However in some instances compensation will not be justified such as where networks of surrounding habitat and meta-population could be destroyed by the loss of one particular piece of habitat or where habitat are not readily recreated."
Para 3.1.4 - strong support for this statement regarding the protection of previously developed land.	Para 3.1.4 - support is noted.	None.
Para 3.2.3 - can Butterfly Conservation go onto the records contacts list?	Para 3.2.3 - Butterfly Conservation will be added to list of contacts and in Appendix 5.	Para 3.2.3 - add "Butterfly Conservation for all searches" to list in text. and to Appendix 5.
Para 3.2.5 - strongly supports reference to considering implications of on-going management requirements beyond the development phase.	Para 3.2.5 - support is noted.	None.
Table 3 - since there are 3 Lepidoptera LBAP species which could be found In Dudley, please can optimum time for species survey be added to this table? (Dates given for presence and habitat surveys).	Table 3 - add details of optimum times of survey for Lepidoptera as recommended.	Table 3 - add "Lepidoptera - Presence April - September, Habitat April - September."
Para 4.3.1 - in point 1 perhaps highlight here that some unusual sites including previously developed land can be important for rare species.	Para 4.3.1 - noted and amend text.	Para 4.3.1 - bullet point 1 - after "by the development" add text to read "Previously developed land can be important for rare species".
Section 6 - general support for the principles of maximising biodiversity opportunities within new developments and early pre-application advice. BC would be happy to help with early advice.	Section 6 - support is noted.	None.

Para 6.3.4 - bare ground is an important component of open grassland habitat for many brownfield Lepidoptera and invertebrates.	Para 6.3.4 - noted and amend text.	Para 6.3.4 - add "bare ground" to text after "and scrub".
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Environment Agency

Summary of comments	Council's Response	Council's Further Action
<p>We welcome the production of the SPD to reinforce and expand on the DPDs, and concur with the view that development provides opportunities for betterment and for enhancing the environment. The opportunities provided by mitigation need to be emphasised. We acknowledge that the SPD complies with recognised nature conservation policies and provides appropriate guidance on how the authority expects nature conservation to be taken into account in the development control process.</p> <p>Section 6 - the inclusion of Sustainable Urban Drainage (SUDs) principles at the early stages of developments can make a significant contribution to enhancing the biodiversity value of new developments.</p> <p>Para 6.5.6 - it is recommended that the SPD should where appropriate actively promote the de-culverting of watercourses and wherever practical to have culverted watercourses restored to open channel. An 8 metre strip on either side of a watercourse is seen as a viable minimum to be protected from development.</p>	<p>The reference to Sustainable Urban Drainage is noted and this will be included in the text. in paragraph 3.2.6.</p> <p>Similarly in 6.5.6 Ponds, Wetlands and Watercourses where reference is made to the encouragement of uncovering watercourses, the text will be strengthened to state that the Council will actively promote the de-culverting of watercourses and encourage the restoration of open channels wherever practical and insert text regarding the requirement of an eight metre strip on either side to be protected from development.</p>	<p>Para 3.2.6 - add new text at the end of the paragraph to read "The inclusion of Sustainable Urban Drainage (SUDs) principles at the early stages of development can make a significant contribution to enhancing the biodiversity value of new developments."</p> <p>Para 6.5.6 - Ponds, Wetlands and Watercourses amend text to read "Where this has happened, the Council will actively promote their de-culverting and encourage the restoration of open channels wherever practical in order to bring them into the overall nature conservation provision of the site". Add new text to read "The Environment Agency recommend that an eight metre strip of land on either side of the watercourse is seen as a viable minimum to be protected from development".</p>

Highways Agency

Summary of comments	Council's Response	Council's Further Action
Whilst the SPD has no direct impact on the trunk roads in the Borough, we consider that they will have an influence on development and on development schemes on the Trunk Road network that may come forward in the future. With this in mind it is important that the Highways Agency are consulted at the earliest opportunity when formulating your development proposals, particularly when adjacent to or affecting an access to a Trunk Road.	The respondent's comments are noted.	No amendments to text.

Countryside Agency

Summary of comments	Council's Response	Council's Further Action
No formal response or comments made	None.	None.

Sandwell MBC

Summary of comments	Council's Response	Council's Further Action
Para 2.4.3 - makes the important point that most of the Borough's natural heritage is outside statutory protection but that in terms of biodiversity for such a Borough they are equally important.	Para 2.4.3 - comments noted.	None.
Para 2.4.9 - good to see watercourses included. Has been promoted by the Chartered Institute of Water Environmental Management.	Para 2.4.9 - comments noted.	None.
Para 3.2.2 - mentions EIAs - for those not familiar with the term they could be signposted to where additional information is available.	Para 3.2.2. - amend text to make clearer.	Para 3.2.2 - amend text in line 2 to read "Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999."

Para 3.2.11 - the impact of imported soil often seems to be overlooked. Would like to see stronger wording re the invasive species if possible.	Para 3.2.11 - noted, additional text will be added to cover this point.	Para 3.2.11 - amend text in line 4 after "introduced" to read "and any imported soil will need to be carefully sourced."
Para 3.2.12 - tables very useful for the non ecologist / planner / developer.	Para 3.2.12 - comments noted.	None.
Para 4.3.1 - checklist useful, ensures good practice but how would an officer know at outset if protected species were likely to be present?	Para 4.3.1 - officers and developers would be referred to the criteria set out in the detailed species guidance set out in Appendix 1 of the SPD.	None.

Wildlife Trust for Birmingham & Black Country

Summary of comments	Council's Response	Council's Further Action
<p>The Wildlife Trust would like to confirm its fullest support for the SPD. It is long overdue, work having started in 1999 and represents a major step forward for biodiversity protection management, enhancement and restoration. It is of Black Country significance. We look forward to helping Dudley Council and its partners implement the document for the benefit of all. The following comments are made on the SPD.</p> <p>Para 2.1.1 - should specifically identify the UK Biodiversity Action Plan, the Birmingham and Black Country Biodiversity Action Plan and the emerging work relating to the Black Country Study and the Black Country Study Urban Park concept</p> <p>Section 2.2 should provide basic information about the nature conservation/biodiversity resource within Dudley and given its Black Country context. This would demonstrate how important Dudley's resource is to the Black Country.</p> <p>Section 2.3 should identify the EU Habitats Directive and the associated Habitats Regulations (1994) since these are also part of the national context.</p>	<p>The Wildlife Trust's support for the SPD is welcomed.</p> <p>Para 2.1.1- noted. These will be added to the list in paragraph 2.1.1.</p> <p>Para 2.2 - the Council believes that this point is adequately covered in the text.</p> <p>Para 2.3 - noted, add text to include reference to the Directives and Regulations in new paragraph 2.3.5 and amend subsequent paragraph numbers accordingly.</p>	<p>Para 2.1.1- add "The Black Country Study", "The Black Country Study Urban Park concept", "UK Biodiversity Action Plan" and "Birmingham and Black Country Biodiversity Action Plan" to the list of bullet points.</p> <p>Para 2.2 - no further change.</p> <p>Para 2.3 - add new paragraph 2.3.5 to read "PPS9 and Circular 06/2005 complement other national and international guidance such as the Conservation (Natural Habitats &c.) Regulations 1994, the Wildlife and Countryside Act 1981 as amended by the Countryside and Rights of Way Act 2000, and the EC Directives on the conservation of wild birds (1979) and of natural habitats and of wild fauna and flora (1972)." Para 2.3.5 - renumber as 2.3.6 Para 2.3.6 - renumber as 2.3.7.</p>

<p>Para 2.4.2 and Table 1 - the SAC site has been formally designated as such and text should be amended.</p> <p>Para 2.4.6 - PPG9 should be PPS9.</p> <p>Para 3.1.2 - would benefit from a final sentence stressing that biodiversity is an important component of environmental quality and that good environmental quality is a clear determinant of a good quality of life.</p> <p>Para 4.1.1 - should also identify the EU Habitats Directive as a key piece of legislative protection for wildlife in the UK. It is from this primary legislation that the Habitats Regulations (1994) are derived.</p> <p>Para 4.2.1 - should identify a cross reference to para 3.2.3 and should identify that EcoRecord is the ecological database for the Black Country and Birmingham and is not as referred to in para 4.2.1.</p> <p>Para 4.3.1 - should explain that the same information about the wildlife species concerned is needed to determine the planning application and to form the protected species licence application. The eventual need for a protected species licence should be identified prior to submission of a planning application, as subsequently explained in section 4.4. The European Protected Species and badgers, the latter covered by separate legislation, are those where there will be licensing issues.</p> <p>Section 5 - no reference to the emerging Black Country Geodiversity Action Plan (BCGAP). Conditions and planning obligations can play a clear role to assist the Council and others to undertake action to implement the BCGAP. Dudley's geological resource should be considered in this context.</p> <p>Para 6.1.1. Should also draw attention to Government Circular 06/2005 since it is this circular which contains much of the detail not included in PPS9.</p> <p>Para 6.5.6 - otters and kingfishers are not B&BCBAP Priority Species though otters are UKBAP Priority Species. Water voles are both UKBAP and B&BCBAP Priority Species. Accessible</p>	<p>Para 2.4.2 - noted, text to be amended.</p> <p>Para 2.4.6 - noted, this was a typing error.</p> <p>Para 3.1.2 - noted, wording will be added as suggested.</p> <p>Para 4.1.1. - noted, add text.</p> <p>Para 4.2.1 - add cross reference to paragraph 3.2.3.</p> <p>Para 4.3.1 - noted, add text to bullet point 2.</p> <p>Section 5 - noted, additional text will be inserted to acknowledge the emerging Black Country Geodiversity Action Plan.</p> <p>Para 6.1.1 - noted although reference is made to the circular in paragraph 2.3.3. Text will be added in 6.1.1.</p> <p>Para 6.5.6 - noted. To avoid confusion the specific species referred to in the text will be deleted.</p>	<p>Para 2.4.2 and Table 1 - amend text to read "SAC" not "cSAC"</p> <p>Para 2.4.6 - amend text to read PPS9.</p> <p>Para 3.1.2 - add to end of paragraph "Biodiversity is an important component of environmental quality and good environmental quality is a clear determinant of a good quality of life"</p> <p>Para 4.1.1 - add "derived from the EU Habitats Directive" in line 2 after "Habitats Regulations".</p> <p>Para 4.2.1 - add "(see paragraph 3.2.3)" after "records centre" in line 1.</p> <p>Para 4.3.1 - add in parentheses at end of bullet point 2 "This information will also be needed when applying for a protected species licence."</p> <p>Para 5.1.1 - add text to end of paragraph to read "The Black Country Geodiversity Action Plan is being produced by a partnership comprising the four Black Country authorities, the Black Country Geological Society, the Wildlife Trusts, English Nature and the Black Country Consortium. The aim is to promote and make accessible the wealth of geological and related cultural and heritage features of the sub-region."</p> <p>Para 6.1.1 - add text "and the accompanying Circular 06/2005 Biodiversity and Geological Conservation - Statutory obligations and their impact within the planning system" after "Conservation" on line 2.</p> <p>Para 6.5.6 - delete "such as otter, kingfisher and water vole" from the text on "Ponds, Wetlands and Watercourses" on page 31.</p>
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<p>Natural Greenspace and Local Nature Reserves are now widely accepted biodiversity / nature conservation provisions with well developed national standards.</p> <p>We are disappointed that the development of ANG and LNR provision has not been explained or encouraged within the draft SPD. In our view, this should be rectified. We feel that guidance for council officers and members, developers and local communities on these provisions is warranted in Section 6. Planning conditions, obligations and management agreements have roles to play in securing these provisions for Dudley's communities.</p> <p>There is no indication of a monitoring and review process - we feel that it is appropriate to outline such a process either at the beginning or at the end of the document.</p>	<p>This is noted but the Council does not believe that further explanation is needed.</p> <p>This will be included in the Council's Annual Monitoring Report to assess whether the SPD is operating successfully.</p>	<p>None</p> <p>None</p>
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English Nature

Summary of comments	Council's Response	Council's Further Action
<p>Overall English Nature supports the draft document but has a number of comments and suggested amendments as follows: - Biodiversity Enhancement Areas require greater coverage and elaboration in the SPD to comply with RSS and Black Country Study.</p> <p>Para 2.4.6 - PPG9 should read PPS9.</p> <p>Table 1 under "status" the summary of protection policies detailed for cSACs, NNRs and SSSIs in column 3 is not fully complete and accurate and could be misleading if read out of context. It is suggested that this wording is omitted and replaced by a reference to where a full statement of protected site policies can be found. As well as cross referencing the UDP this could include a reference to para 8 of PPS9 which states the national policy on SSSIs.</p> <p>Para 3.1.3 1st bullet point - include reference to "aged" or "veteran trees" to comply with para 10 of PPS9.</p>	<p>Noted - reference is made to Biodiversity Enhancement Areas in paragraph 2.2.8. A further reference will be made in paragraph 3.2.5.</p> <p>Para 2.4.6 - noted, text will be amended accordingly.</p> <p>Table 1 - following discussions with English Nature the comment has been withdrawn.</p> <p>Para 3.1.3 - noted, text will be amended accordingly in both instances.</p>	<p>Para 3.2.5 – bullet point 5 – after “may provide” add “including towards the aims of any relevant Biodiversity Enhancement Areas”.</p> <p>Para 2.4.6 - amend "PPG9" to read "PPS9" in line 1</p> <p>Table 1 - no change.</p> <p>Para 3.1.3 - add "aged or 'veteran' trees" to text after "ancient woodland".</p>

<p>Para 3.1.3 5th bullet point - suggest insertion of the text "networks of natural habitats" at the beginning to reflect wording of PPS9 para 12.</p> <p>Para 3.2.1. and Table 1 - all references to cSAC should read SAC as status changed.</p> <p>Para 3.2.7.- suggest insertion of the wording "as a last resort" at the end of the paragraph to strengthen the statement and bring it in line with English Nature's published guidelines on translocation.</p> <p>Para 3.2.9 - "are" should read "area" in line 2.</p> <p>Para 4.2.1. - 1st bullet point rephrase to add clarity to lay person "To include obtaining relevant records from EcoRecord..."</p> <p>Para 4.2.2 - add "as a last resort" in asterisk text on page 17 to strengthen the statement in line with English Nature published mitigation guidelines.</p> <p>Para 5.5. - 2nd bullet point does not make sense.</p> <p>Para 5.5 - recommend that an additional bullet point is added along the lines "Recognise that national policy in PPS9 is that proposals should aim to maintain and enhance or restore or add to geological conservation interests".</p>	<p>Para 3.2.1 - noted, text and table will be amended.</p> <p>Para 3.2.7 - noted, add wording as suggested.</p> <p>Para 3.2.9 - agreed, this is a typographical error.</p> <p>Para 4.2.1 - noted, text will be added as suggested.</p> <p>Para 4.2.2.- noted, additional wording will be added.</p> <p>Para 5.5 - agreed, amend text to 2nd bullet point.</p> <p>Para 5.5 - agreed, extra bullet point added as suggested.</p>	<p>Para 3.1.3 - add "Networks of natural habitats:" at start of bullet point 5.</p> <p>Para 3.2.1 and Table 1 - amend text to read "SAC" and not "cSAC".</p> <p>Para 3.2.7 - add "as a last resort" to the end of the paragraph.</p> <p>Para 3.2.9 - amend "are" to "area" in line 2.</p> <p>Para 4.2.1. - amend text in bullet point 1 to read. "To include obtaining relevant records from EcoRecord".</p> <p>Para 4.2.2 - add "as a last resort" to asterisk text after "should only be considered".</p> <p>Para 5.5 - amend second bullet point to read "recognise that information on all known important geological sites in the borough is held in the Geological Records centre at Dudley Museum and Art Gallery and this is the most useful source of immediately relevant information".</p> <p>Para 5. 5 - additional bullet point 8 to read "recognise that the principle set out in national policy in PPS9 is that proposals should aim to maintain, and enhance, restore or add to geological conservation interests".</p>
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Council for British Archaeology West Midlands

Summary of comments	Council's Response	Council's Further Action
CBA West Midlands feels that the document should refer to the historic environment because of the close relationship between the "natural" and historic environment, and the potential impact of some of the measures suggested in the document on the historic environment.	The Council acknowledges that there is a close relationship between the natural and the historic environment and makes several references to the Borough's historic past, the canal network and its geological heritage. It is not felt that additional text is needed.	None.

Campaign to Protect Rural England

Summary of comments	Council's Response	Council's Further Action
Para 5.5 -bullet point 5 - it may be over-stressing the status of geological sites to say their preservation is the "Council's first priority".	Para 5.5 - this is noted and text in bullet point 5 will be amended to remove this ambiguity.	Para 5.5 bullet point 5 to read "recognise that where a proposed development identifies that a conflict with an existing geological site of designated quality and importance will occur, it shall be the Council's first priority to enter into early liaison about this development to seek alternative layouts of mitigation for the likely damage that may be caused to the designated feature. In the extreme example where no alternative layouts or acceptable mitigation are possible the development will be refused.
Para 5.5 - bullet point 7 - removal of an existing geological feature may (almost certainly) not be capable of replacement by a new or alternative feature.	Para 5.5 - bullet point 7 - the wording is ambiguous and will be amended.	Para 5.5 bullet point 7 - amend wording to read "recognise that in the unlikely event that existing features cannot be accommodated then it will be necessary to create new geological features in alternative areas in agreement with the Keeper of Geology where geological conditions are equivalent or acceptable as mitigation for the feature to be compromised in the development."
It would have been helpful to have given a little more practical guidance on methods of retaining nature conservation intended in new development, especially high-density, high	Para 5.5 - add new text in new bullet point 9 to direct people to good practice guidance set out by English Nature.	Para 5.5 -add text in new bullet point 9 to read "For practical examples of methods and typical considerations involved in conservation of geological sites the developer should refer to

site-coverage proposals.		English Nature's 2006 publication ' Geological Conservation - a guide to good practice'. However each site will have its own characteristics and challenges and early consultation about the individual sites is essential."
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