Iping & Stedham Commons – Consultation on management, stage 2

Introduction

The management plan for Iping and Stedham Commons is due for renewal and as part of the process of deciding the most appropriate techniques and actions for future management of the nature reserve Sussex Wildlife Trust (SWT) has carried out a public consultation. The first phase of this consultation was conducted in July and August 2013. This was undertaken under the guidance of Footprint Ecology and was based on the principles set out in ‘A Common Purpose, a guide to agreeing management on common land’ (Short et al., 2005). This publication, produced by the Open Spaces Society and Natural England and on which Footprint Ecology was closely consulted, sets out best practice guidance on consultations over the management of common land. Footprint Ecology is an independent consultancy and the staff have many years’ experience of heathland management.

There is a range of actions that can be used to manage lowland heathland. These are outlined in the background paper that was available as part of the consultation on Iping and Stedham Commons. Briefly, the range comprises: turf stripping; mowing; burning; herbicide spraying/bruising/cutting (for controlling bracken); grazing and removal of encroaching trees and scrub.

A further choice could be to do nothing but this is not considered to be realistic. Iping and Stedham Commons are designated as Sites of Special Scientific Interest under national legislation. Under the Countryside and Rights of Way Act (2000) such sites must be managed to restore and maintain favourable condition. Without appropriate management, the wildlife interest on the Heaths will deteriorate which, apart from being contrary to the objectives of the SWT as site managers, would trigger greater involvement by Natural England to safeguard the future management of the site. Lack of management would result in the Common becoming increasingly covered with scrub and trees, so losing its open character and views and being much less accessible and enjoyable for visitors. For managers of the heath, to do nothing is therefore not an option.

No single management action would cover all requirements for the long-term conservation of heathland species and habitat, and in practice a combination of techniques is almost always the preferred and best course.

Most of the management techniques are already in place on SWT or other nearby heathlands, and in most instances on Iping or Stedham Commons. They are thus familiar and their effects and implications both for wildlife and users of the Commons are understood. The management that appears to evoke most concern, at least where it has not been in place in recent times is grazing, although such management would have been the norm on heathland for many centuries until the post-war period.

When there are concerns about grazing these are often about the impact of grazing on species but most objections revolve around the need for containment of livestock by some form of fencing and thus gates. The loss of openness of the landscape is often cited and there is too a real concern from some about the presence of free-roaming livestock, especially in the case of horse riders and dog walkers.

Consultation

A first phase of public consultation took place during July and August 2013 with a large number of people responding by means of an on-line and paper version questionnaire. A background paper
explaining the need for management and the potential techniques available was made available, while ‘drop-in’ days and guided walks were programmed to facilitate discussion.

A full report of the public consultation and an analysis of the results were prepared. In all 86 questionnaires were submitted and 5 emails/letters. In response to that part of the questionnaire which dealt with management by grazing and fencing, grazing was the favoured management technique (73%) followed by mowing (50%) and with controlled burning (44%) and turf stripping (47%) slightly less least popular choices. The greatest uncertainties were about mowing, burning and turf stripping with least uncertainty about grazing. If grazing were to be adopted the choice of livestock was most in favour of cattle (74%) or a combination (71%), with rather fewer favouring ponies (64%) and sheep (60%).

For containment of any grazing livestock there was a clear preference for a perimeter fence with all access points maintained (73%), followed by shepherding for sheep (57%). Fenced enclosures within the Common were less favoured – 30% for small enclosures and 27% for large enclosures.

Based on this report a set of recommendations was made to Sussex Wildlife Trust for management of the Commons. (These recommendations are in Appendix 1.) SWT responded accepting the recommendations and, in line with one of the recommendations, embarked on a second round of consultation in particular focussing on one of the proposals – to re-establish grazing at Iping Common. Such a management technique, though traditional for heathland commons, would in the modern-day context require the need for containment of livestock by fencing and this formed the main subject of the second consultation.

The alignment of a proposed fence line was shown on a map of Iping and Trotton Commons, together with the suggested location for gates and type of gates (pedestrian, equestrian, management vehicles).

The second consultation ran initially from late October until 9 December 2013. As well as information sent to those who had commented on the first consultation, the consultation was advertised in the local parish magazines, on the Trust website and notices were put up and maintained at access points on Iping Common, in Midhurst at The Grange, Library and Information Centre, at Stedham on site and at the Memorial Hall, School and two Parish notice boards, on the Parish notice board at Iping, at Trotton at the Church and garden centre, at Elsted Village Hall and the pub and at the shop at Rogate. In all, 25 notices were posted. There was also a ‘drop-in’ session at Stedham Village Hall during the late afternoon/evening of 18 November and a guided walk on the Common, specifically to discuss the fencing proposals, on 16 November.

During the consultation, which elicited equal numbers in support and in opposition to the fencing and grazing proposal, there were complaints from some objectors that information about the consultation had not been adequately publicised. Sussex Wildlife Trust decided therefore to extend the consultation period for a further two months, until end February 2014. News of this extension was circulated to all previous consultees and respondents, sent to every household in the three neighbouring parishes (666 in total), advertised on posters at the previous sites, in parish magazines, and with an article in the local press. Again this was accompanied by two drop-in sessions (at Elstead on 8 February and Stedham on 10 February) and a site visit on the Common specifically for horse riders. SWT also produced an information sheet with frequently asked questions and answers, in an attempt to correct some misconceptions about the proposal.

The drop-in sessions were attended by SWT staff and consultants and altogether 56 people called in to see and discuss the proposals. The walks/site meetings were led by SWT staff and 37 attended
(although some people came to more than one session). Many left brief written comments and some had suggestions for amendments such as additional gate positions and design.

Responses

The original period of consultation on the fencing/grazing proposal produced 25 responses in support or with no objection and 24 responses from objectors. The supporting responses were mostly from individuals but included two from organisations –, RSPB and South Downs National Park Authority and Stedham with Iping Parish Council and the Open Spaces Society wrote to say they did not object. The objections came from individuals but included four from members of the same family and also one with the names of 140+ who had signed a petition against the proposal. The information provided for the petition was not made known to SWT by the organisers but one objector, asked for their name to be deleted from the petition signatures on finding out more of the details of the proposal. Trotton cum Chithurst Parish Council forwarded the petition information to SWT. From this it was clear that some of the information was incorrect, in particular the assertion that the proposal meant that dogs would at all times need to be kept on leads. The Trust has still not seen the petition at the time of writing this report.

The extension period elicited 26 letters of support and 11 of objection. Four of the supporters and one of the objectors had also responded during the initial period of second round consultation. These were all from individuals except for one in support from the South Downs Local Access Forum that has representatives from landowners, user groups eg the Ramblers and BHS and wildlife organisations. The total of respondents to the consultation was 80 with 41% in objection.

Several of those in support of the perimeter fencing and grazing proposal were happy with the idea of cattle grazing but had reservations about the possible use of ponies for grazing, mainly because of the unpredictability of ponies and the risk that they would pester horse riders. Several of those in support were also horse riders but saw no problem with the proposed gates or cattle grazing.

The main reasons for objection were the sense of enclosure that perimeter fencing would bring; the inconvenience and difficulty of negotiating gates, especially for riders; fear of cattle; and the continued misconception that grazing would require dogs to be kept on leads. Several also cited discontent with existing heathland management such as the removal of trees and the use of tracks for timber extraction by the neighbouring estate that had made some paths badly rutted.

A meeting was held on site with horse riders on 8th February 2014. At this meeting concerns specific to horse riders were expressed. These were that: There were no other options in the area for those who did not like to ride in sites with cattle or had difficulty with gates; grazing by ponies was seen as unacceptable; it would be impossible to ride and at the same time lead ponies through gates; children would not be able to open the gates. One attendee who rides on Blackdown and Stedham Common said she had had no problems with cattle or gates.

Various other concerns were raised about the consultation and the management of the Common but all those present said they had already written to the Trust, raising their concerns. Unfortunately riders were not willing to discuss their views on potential improvements to the scheme or gates specifically. This instead has been discussed with BHS and a local rider.

Follow-on

It will be up to Sussex Wildlife Trust to decide whether to take forward the proposal for perimeter fencing and grazing as part of the management of Iping Common, and if so whether to make any
amendments to the scheme, such as new or different gate positions. If the proposal is pursued an
application to the Planning Inspectorate will be required and this will include a further period of 28
days public consultation on the proposals, based on a map showing the fence line and details of gate
types and positions.

Appendix 1

Summary of Recommendations in first report on consultations

- Management of the common should make full use of a combination of the main heathland
  management techniques including grazing, mowing, controlled burning and localised turf
  stripping.
- Assess the current extent of encroaching trees and scrub to draw up a programme for
  clearance and management of retained scrub and trees.
- Use the opportunity of heathland walks and interpretation to illustrate the value of patches
  of bare ground for wildlife and especially invertebrates. Involve archaeologists and
  invertebrate specialists in helping to identify suitable areas turf removal, including disposal
  of the stripped material.
- Decide if burns are necessary to restart heather cycles and if so prepare a programme of
  controlled burning probably no more than 1 hectare annually in selected areas. Before any
  burning takes place, inform nearby properties of its timing and duration, explaining the
  reasons.
- Continue the use of mowing adjusting its extent as the introduction of other management
  techniques allows.
- Assess the extent of bracken on the commons and put in place a programme of treatment.
  Spraying when carried out correctly poses no threat to the visiting public or wildlife so a
  combination of spaying, cutting and rolling should offer the best chance of effectively
  controlling bracken.
- Introduce grazing to the commons, as part of the combination of techniques available for
  effective heathland and grassland management.
- The use of sheep for grazing the common is not practical with loose dogs. Grazing on the
  commons should be primarily by cattle during the spring and summer with ponies grazing all
  the year round to be implemented if possible as an additional benefit. Maximum stocking
  rate could start at about 1 animal per 15 hectares but could be varied in the light of
  experience. Older cows of a traditional docile breed should be used, along with Exmoor or
  New Forest ponies.
- Permanent perimeter fencing is the preferred option. Enclosures are seen as more labour
  intensive, more intrusive and a less effective way of promoting extensive grazing over the
  whole of the commons. Further consultation with users of the commons will be necessary to
  arrive at the most acceptable scheme.
- Continue the programme of monitoring on the commons and encourage the local
  community to participate in aspects of survey and monitoring eg through workshops/guided
  walks.
• SWT should keep in touch with the local community for instance by maintaining events such as walks and talks, and by circulating or posting on-line a newsletter covering the latest news and proposals for future management of the nature reserve. It would also be desirable to continue regular articles in parish magazines and on site seasonal information.

• Undertake a consultation with previous respondents and the local community on a preferred option for fencing and grazing based on maps of proposals.

• Review the use of tracks and prioritise for access by machinery, horses, cycles and on foot.

• Work with other managers of countryside sites, especially heathlands, to promote responsible behaviour by dog walkers, including encouraging peer pressure to keep dogs on leads during sensitive periods and to pick up and remove dog mess.

Should SWT decide to favour a grazing scheme on Iping Common using either compartments or perimeter fencing, temporary or permanent, then it would be necessary to make an application to The Planning Inspectorate (PINS) for consent under section 38 of the Commons Act 2006 to erect structures on the Common and any associated works such as trenches for water pipes to water troughs.

Once a decision is made on the preferred option, a further public consultation will be needed, based on a set of proposals with an explanation and maps showing the route of fencing, location of gates etc. This would follow the now well established procedure of local advertising and events to inform local people and local and national organisations to comment, suggest amendments or if they wish, object. The objective is to reach as wide a consensus as possible for a scheme as proposed or amended via an open and transparent process. This would take about three months.

If, following this, the Trust decides to go ahead then an application will need to be put together and submitted to PINS. This can be a complicated process involving the preparation of detailed maps and a comprehensively referenced and comprehensive application supported by further maps and documents including necessary consents and support from statutory bodies. This would take three to four months.

When the application is made it has to follow a set procedure with notification to the public and statutory consultees, and a copy has to be made available for 28 days for public inspection. Members of the public or organisation may respond to the application by writing to PINS to support or object. If objections are made, PINS may send these to the applicant to see whether the scheme can be amended to remove the objections.

Guidance from the Planning Inspectorate states that

“As a guide, if there are no objections, and the issues can be resolved by correspondence, we would expect to determine your application within three months of receiving the complete application papers from you. This might extend to five months if an exchange of correspondence is needed, seven months for cases involving a site visit, or eight months for a public inquiry or hearing”.

If it seems likely that the level of objection could lead to a public inquiry then SWT could at that time, reconsider the options, which would include withdrawal of the application.