

Comments on the Consultation Draft Management Plan (November 2013) 2014-2019.

The Countryside and Rights of Way (CROW) Act 2000, Sections 89 and 90, require local authorities to publish AONB Management Plans at not more than five year intervals. The current Wye Valley AONB Management Plan is dated 2009-2014. A Consultation Draft AONB Management Plan 2014-19 was published in November 2013 with a 10 weeks public consultation period. In addition two seminars were held with key stakeholders in January 2014 to provide further opportunities for everybody to inspect and comment on the Plan. A total of 27 organisations and individuals submitted comments on the Consultation Draft AONB Management Plan 2014-19, amounting to approximately 316 specific comments. Those comments and the formal responses and consequent recommended amendments to the AONB Management Plan are tabulated below.

As a consequence of slippage in the timetable for finalising of the review Plan the Wye Valley AONB Joint Advisory Committee decided to redefine the period of the five year period of the AONB Management Plan to 2015-2020.

The table below lists the organisations and individuals who submitted comments, in the order that they were received &/or processed. The subsequent table lists, in the same order, the comments they submitted and the corresponding formal response and recommended amendments to the Plan.

	Organisation	Lead Contact	Address	sector
1.	Woodland Trust	Justin Milward Regional & Local Government Officer (South West)	Woodland Trust, Jayrise, Butcombe, Bristol BS40 7UT	3 rd
2.	The Planning Company	Colin Blundel	The Planning Company, 51 Battenhall Rise, Worcester, WR5 2DE	Private
3.	CLA (Country Land and Business Association)	Donna Tavernor Midlands Rural Adviser	CLA Midlands, Knightley, Woodseaves, Staffordshire, ST20 0JW	Private
4.	Philip Heath	Philip Heath	Walford	Private
5.	Sustrans	Gwyn Smith Area Manager	South East Wales, Sustrans Cymru, 123 Bute Street, Cardiff, CF10 5AE	3 rd
6.	BSBI (Botanical Society of Britain and Ireland)	Elsa Wood	Tintern	3 rd
7.	Forestry Commission	Simon West	North West & West Midlands, Government Buildings, Whittington Road, Worcester, WR5 2FR	Public
8.	FoDDC (Forest of Dean District Council)	Alastair Chapman	Forest of Dean District Council, Coleford	Public
9.	Chris McFarling	Chris McFarling		Private
10.	GCC (Gloucestershire County Council)	Rob Niblett Planning Officer	Gloucestershire County Council, Shire Hall, Gloucester, GL1 2TH	Public
11.	GGAT (Glamorgan-Gwent Archaeological Trust)	Dr E. M. Evans Heritage Outreach Manager	Glamorgan-Gwent Archaeological Trust Limited, Heathfield House Heathfield, Swansea, SA1 6EL	3 rd

Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2014-2019
 Response to Consultation Draft comments (closed 31st January 2014)

	Organisation	Lead Contact	Address	sector
12.	GOT (Gloucestershire Orchard Trust)	Keith Turner Chairman	Gloucestershire Orchard Trust	3 rd
13.	FoD BPT (Forest of Dean Buildings Preservation Trust)	Jim Chapman Chairman	Forest of Dean Buildings Preservation Trust	3 rd
14.	Les Lumsdon	Professor Les Lumsdon,	Transport Consultant, Ludlow	Private
15.	Richard Newhouse	Richard Newhouse	Penallt	Private
16.	MCC (Monmouthshire County Council)	Matthew Lewis Countryside Manager	Regeneration & Culture Monmouthshire County Council	Public
17.	MMG (Monmouthshire Meadows Group)	Dr Stephanie Tyler Chairman	Penallt	3 rd
18.	NE (Natural England)	Hazel McDowall Lead Advisor	Natural England, Block B Whittington Road Worcester, WR5 2LQ	Public
19.	Neil Cockburn	Neil Cockburn	Kings Caple, Herefordshire	Private
20.	NRW (Natural Resources Wales)	Rhian Jardine Head of Sustainable Communities	Rivers House, Fortran Road, St Mellons, Cardiff, CF3 0EY	Public
21.	DI (Deer Initiative)	Graham Riminton, Deer Liaison Officer Wales and the West Midlands	The Deer Initiative Ltd. The Carriage House, Brynkinalt Business Centre, Chirk, Wrexham, LL14 5NS	3 rd
22.	CE/BCU (Canoe England and the British Canoe Union)	Chris Hawkesworth	British Canoe Union	3 rd
23.	WV&FoDTA (Wye Valley & Forest of Dean Tourism Association)	John Theophilus	Lydbrook	3 rd
24.	EH (English Heritage)	Liz Clare Local Engagement Adviser	English Heritage, 29 Queen Square, Bristol BS1 4ND	Public
25.	NFU (National Farmers' Union)	Sarah Faulkner Rural Affairs and Environment Adviser	National Farmers' Union, West Midlands Region, Agriculture House, Southwater Way, Telford, Shropshire TF3 4NR	Private
26.	CRT (Capital Region Tourism)	Peter Cole Regional Strategy Director	Vale of Glamorgan,	Public
27.	Sue Parkinson	Sue Parkinson	Monmouth	Private

Organisation / Name	Paragraph / Policy	Respondent's change or addition	Response	Recommendation
1. Woodland Trust	8.6.8	<p>Ancient Trees We are pleased to see this draft Management Plan recognise the unique asset of the Wye Valley's irreplaceable ancient woodland resource. It is also important to recognise as well the importance of ancient, veteran and notable trees in the Wye Valley, as referred to in paragraph 8.6.8</p> <p>Ancient trees are living relics of incredible age that inspire in us feelings of awe and mystery, contributing to both biodiversity and cultural history. They are a precious part of our heritage, which need our care and attention in order to ensure their survival. The Woodland Trust and Ancient Tree Forum are running a national project – the Ancient Tree Hunt - to identify and map ancient trees (http://www.ancienttreehunt.org.uk/) so they can be protected and enhanced for the benefit of all. As a result a number of ancient trees have been recorded, such as the</p> <p>It is important that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. The</p> <p>Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments scheduled under TPOs and highlighted in plans so they are properly valued in planning decision-making. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees.</p>	<p>Agree with recognition of ancient trees. Note significance of 'awe & mystery' and need to plan for future planting and management.</p>	<p>Insert as penultimate sentence in 8.6.8 "Ancient trees are living relics of incredible age that inspire in us feelings of awe and mystery, contributing to both biodiversity and cultural history."</p> <p>Add to Action Plan: a) A planting programme is required to ensure there are mature single and hedgerow trees in the future. b) The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments scheduled under TPOs and highlighted in plans so they are properly valued in planning decision-making.</p>
1. Woodland Trust	Table 8: Special Quality 2. Woodlands	<p>The new National Policy Planning Framework clearly states: "...<i>planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland...</i>" (DCLG, March 2012, para 118).</p> <p>The Government Forestry Policy Statement (Defra Jan 2013) states that: '<i>We recognise the value of our native and ancient woodland We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England's ancient and native woodland</i>'. Keepers of Time – A statement of Policy for England's Ancient & Native Woodland'</p>	<p>Ancient trees already listed as a Special Quality- No.18 Recognise that many ancient / veteran trees are in Wye Valley woodlands, therefore cross reference between Special Quality 2. Woodlands</p>	<p>In Recognition column of Special Quality 2. Woodlands: Insert after '...including 35 SSSIs.' "and many ancient / veteran trees (See SQ18)."</p>

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		<p>(Defra/Forestry Commission, 2005, p.11) seeks to: <i>'Take steps to avoid losses of....ancient and veteran trees'</i></p> <p>To properly reflect Government policy, we would therefore like to see ancient trees referenced in the woodland section (section 2) of Table 1: Special Qualities of the Wye Valley AONB (p.34).</p>	and Special Quality 18. Ancient Trees	
1. Woodland Trust	WV-W2	<p>We also suggest that, under Woodland, Trees and Forestry Strategic Objectives (p.68), Objective WV-W2 should be amended as indicated (upper case amendment) – <i>Develop and support tree, woodland and forestry initiatives and policy that conserve, restore and/or enhance the Special Qualities, biodiversity and natural beauty of the area, INCLUDING ANCIENT AND VETERAN TREES ensuring no net loss of semi-natural woodland cover unless there are overriding nature or heritage conservation benefits.</i></p>	Ancient Trees already a Special Quality therefore unnecessary to reference again specifically.	No change
1. Woodland Trust	8.6.10	<p>PAWS restoration The draft Plan highlights in (section 2) of Table 2: Special Qualities of the Wye Valley AONB (p.34) the threat to ancient woodland sites from conifers and other inappropriate non-native species, known as Plantations on Ancient Woodland Sites or PAWS.</p> <p>The importance of this is that PAWS is in urgent need of restoration. Only two per cent of the UK is ancient woodland (552,000ha) and forty per cent (223,000ha) of this scarce resource has been converted to PAWS. Although often damaged, these PAWS sites still retain Ancient Semi-natural woodland features that existed before conversion, and these can be managed to help restore this valuable habitat. This is the only way of increasing the area of ancient woodland with semi natural characteristics.</p> <p>Between the 1930s and 1980s, hundreds of thousands of hectares/acres of ancient woodland were converted to conifers with the aim of producing timber for the forestry industry. The communities of plants and animals that depended upon the stable environment that ancient woodland provided were damaged by the process of establishing the conifers. However, although damaged these woods are not beyond repair. Many of these planted ancient woods still have elements of the previous native woodland ecosystem surviving. We need to take action to save what remains and build on it and, we need to start this process as soon as possible. Research shows that most of the conifers planted on ancient woodland sites will reach maturity in the near future. If they are felled and replaced with more conifers then the ancient woodland remnants that have hung on through the first period of conversion may not survive a second rotation.</p>	Acknowledge the significance of PAWS for ancient woodland conservation and enhancement. However, a new paragraph is unnecessary as more appropriate to 8.6.7	Insert as penultimate sentence in 8.6.7: "The only way of increasing the area of ancient woodland with semi natural characteristics is through PAWS restoration. To make the most of these remnants, it is good practice to change the woodland canopy structure gradually, rather than removing non-native tree species in one go".

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		<p>The best way to make the most of these remnants is to change the woodland canopy structure gradually, rather than removing non-native tree species in one go, which has been the most common approach in the past. We have combined this research with our own experience to produce a short guide for woodland owners and managers entitled <i>The Conservation and Restoration of Plantations on ancient woodland sites</i> - available on the Trust's website - http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx</p> <p>The Government's Forestry Policy Statement clearly states that: 'We recognise the value of our native and ancient woodland and the importance of restoring open habitats as well as the need to restore plantations on ancient woodland sites. We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England's ancient and native woodland' (Defra, Jan 2013, p.19). 'Keepers of Time' (Defra, 2005, p.19) seeks to measure success by having 'The majority of planted ancient woodland sites either being improved or under gradual restoration to native woodland).</p> <p>The SW Regional Woodland & Forestry Framework (Forestry Commission 2005) highlights the need to restore "Woodlands where existing management objectives or processes are causing decline in biodiversity and the means to remedy these is evident, e.g. resumption of coppice, improvement of PAWS sites" (Section 5/p.28)</p> <p>To reflect this policy, we would like to see an additional paragraph 8.6.10 (under the 'Woodlands, Trees and Forestry' heading summarising the PAWS threat.</p>		
1. Woodland Trust	WV-W1	<p>We also suggest that the need for PAWS restoration should be reflected in Woodland, Trees and Forestry Strategic Objectives (p.68), Objective WV-W1 and amended as indicated (upper case amendment) – Provide best practice advice to woodland owners and managers on sustainable multipurpose management of the Wye Valley woodlands INCLUDING SENSITIVE PAWS RESTORATION, encouraging 'the right tree in the right place' and the ecosystems approach.</p>	Accepted	Amend as suggested
1. Woodland Trust	WV-W2	<p><i>Woodland creation</i> Whilst we appreciate that the Wye Valley is a well wooded area, it is nevertheless important not to forget the wider benefits of planting more trees in appropriate landscape locations. The Woodland Trust believes that woodland creation is especially important because</p>	Acknowledged in 8.6.7. The use of '&/or enhance' in WV-W2, while not explicitly implying	No change

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		<p>of the unique ability of woodland to deliver across a wide range of benefits all at the same time – see our publication Healthy Trees, Healthy Places http://www.woodlandtrust.org.uk/mediafile/100098292/Healthy-Trees-Healthy-Places-WT-Jul-2013.pdf .These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and social benefits (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets).</p> <p>In the Wye Valley particularly there may be particular opportunities to –</p> <ul style="list-style-type: none"> • Buffer and extend existing fragmented ancient woodland to make it more robust in the face of climate change and hostile adjacent land use. • To buffer and extend other semi-natural habitats – see Objective WV-B3 (p.60) on landscape scale habitat connectivity – to support better ecological connectivity • To use woodland creation as a natural environment tool to deliver positive water flow (flooding) and quality (Water Framework Directive) outcomes. <p>As regards woodland and water specifically, The Woodland Trust believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change like flooding and the water quality implications caused by extreme weather events. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Woodland actions for biodiversity and their role in water management (pdf) - https://www.woodlandtrust.org.uk/mediafile/100083927/Woodland-actions-for-biodiversity-and-their-role-in-water-management.pdf.</p> <p>In addition, a joint Environment Agency/Forestry Commission publication Woodland for Water: Woodland measures for meeting Water Framework objectives states clearly that: ‘There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives’ (Environment Agency, July 2011- http://www.forestry.gov.uk/fr/woodlandforwater). This is most readily realisable at a Catchment scale.</p> <p>We therefore suggest that woodland creation should be reflected in Woodland, Trees</p>	<p>‘expand’ does not exclude opportunities for woodland creation or expansion. This is similarly endorsed by WV-W1 supporting “sustainable multipurpose management of the Wye Valley woodlands,, encouraging ‘the right tree in the right place’ and the ecosystems approach”</p>	

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		<p>and Forestry Strategic Objectives (p.68), Objective WV-W2 and amended as indicated (upper case amendment) –</p> <p>Develop and support tree, woodland and forestry initiatives and policy that conserve, restore, enhance AND/OR EXPAND the Special Qualities, biodiversity and natural beauty of the area, INCLUDING ANCIENT AND VETERAN TREES ensuring no net loss of semi-natural woodland cover unless there are overriding nature or heritage conservation benefits.</p>		
1. Woodland Trust	WV-W5	<p><i>Community woodland</i></p> <p>We would like to see a specific reference to community woodland ownership and management. Community woodland is an excellent way of facilitating local community engagement with the natural environment, both to appreciate landscape and nature but also as a means to achieving better mental and physical health & wellbeing. Older people too can use community woodland projects to help mitigate the effects of social isolation.</p> <p>This is supported in the Government Forestry Policy Statement (Defra Jan 2013) which states: ‘A true and sustainable woodland culture needs to be built from the ground up and must be based on the needs, interests and enthusiasm of local people. We, therefore, applaud the work of organisations like the Tree Council, Community Forests, Woodland Initiatives Network, Small Woods Association and the Woodland Trust in supporting and promoting community action on trees and woodlands’. It contains an objective: ‘Work with the sector in seeking funding for possible future initiatives aimed at developing local access, individual potential and community cohesion through engagement with trees, woods and forests’.</p> <p>We therefore suggest that woodland creation should be reflected in Woodland, Trees and Forestry Strategic Objectives (p.68), Objective WV-W5 and amended as indicated (upper case amendment) –</p> <p>Increase understanding, awareness and enjoyment of trees and the special nature of the Wye Valley woodlands and promote them as a resource for appropriate educational, recreational and health opportunities INCLUDING COMMUNITY WOODLAND ACTIVITY.</p>	Accepted	<p>Insert in 8.6.6final sentence: “community woodland activity,” before ‘Forest Schools’</p> <p>WV-W5: Insert “, community” between ‘recreational and health’ to read: “Increase understanding, awareness and enjoyment of trees and the special nature of the Wye Valley woodlands and promote them as a resource for appropriate educational, recreational, community and health opportunities”</p>
2. The Planning Company	9.1.2	<p>Should read: “National policy for AONBs in Wales is contained in Planning Policy Wales (PPW) and for England in the National Planning Policy Framework (NPPF). Local development management policies are set out in the Local Plans, Local</p>	Accepted	Amend

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		Development Plan and emerging Neighbourhood Plans and are based on an up to date evidence base. The PPW & NPPF provide specific planning guidance for plan makers and decision takers in relation to AONBs and both confirm that great weight should be given to conserving landscape and scenic beauty in AONBs, and that AONBs have the highest status of protection in relation to landscape and scenic beauty (equal to National Parks)."		
2. The Planning Company	9.1.2	Insert an additional paragraph: "Section 14 of the NPPF includes a presumption in favour of sustainable development, which aims to make it easier for development to be approved. However, the footnote to the section makes clear that where policies relating to AONBs are included in the NPPF these may indicate that development should be restricted. The principal sections relating to AONBs are sections 115 and 116. The effective enforcement of these policies will be crucial as demand for housing on greenfield sites is currently increasing to meet the demand for new homes nationally".	The footnote is referenced in the Sustainable Development section, para 4.1.4. However it is appropriate to reiterate it in the next paragraph, 9.1.3. But the NPPF only refers to major development and much of the housing demand within the AONB is for small scale development and in fill that may not reach the major development threshold. Therefore specific reference to housing is not appropriate.	Insert in 9.1.3 before penultimate sentence "Section 14 of the NPPF includes a presumption in favour of sustainable development, which aims to make decision making on developments easier. But the footnote to the section (para 14, footnote 9) makes clear that the AONB policies in the NPPF (sections 115 and 116), may take precedent over this presumption."
2. The Planning Company	9.1.2	Insert specific references, to read: "The 'great weight test' (PPW section 5.3.6 and NPPF section 115) is significant and one of the most stringent legal tests that can be applied under planning law. In relation to major development, both PPW (section 5.5.6) and the NPPF (section 116)"	Accepted	Amend
2. The Planning Company	9.1.4	Amend to say: "At the time of writing (2013), all four local planning authorities have been preparing their Local Development Frameworks or Plans, with only the Forest of Dean Core Strategy having been adopted."	Recognise that this is on-going, but not necessary to peg to 'time of writing'.	No change
2. The	9.1.7	Insert before 2 nd last sentence "Landscape and Visual Impact Assessments (LVIA) are	Accepted	Amend

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Planning Company		becoming an essential tool in the planning process for identifying impacts on landscape character and visual impacts from major developments”.		
2. The Planning Company	9.1.8	Add “and renewable energy installations” in reference to Permitted Development Rights.	Accepted	Amend
2. The Planning Company	WV-D1	Add a new Strategic Objective: “Work with local planning authorities to ensure that the national policies relating to giving ‘great weight’ to AONBs and in relation to major developments are thoroughly applied in assessing developments in the AONB and its setting.”	The Management Plan belongs to the LPAs, this therefore refers to effective application of policy which is more appropriate as an Action	Add to Action Plan: “Work with local planning authorities to ensure that the national policies relating to giving ‘great weight’ to AONBs and in relation to major developments are thoroughly applied in assessing developments in the AONB and its setting”
2. The Planning Company	9.2.2	Delete ‘loud’ as already said ‘noisy’	Accepted	Amend
3. CLA	General	Rural land management is enormously important in maintaining the environment. It is largely the actions of private individuals, organisations and businesses, in partnership with public support, that have produced such diverse and beautiful countryside. It will be private individuals, organisations and businesses that secure its future.	Acknowledged. Reference is made in 1.3.2, 2.1.7, 3.1.1, 5.4.1, 8.5.2, 10.2.1 & 10.2.3	5.1.2 Insert at end “Their future relies on sustaining people's relationship to the land and its resources.”
3. CLA	General	The AONB must recognise that the designation of an area of land alone will not ensure its protection and enhancement. AONB designation should not be used as a negative planning instrument, and rural areas that are designated cannot remain immune from events occurring within the economy. AONB policies must include sustainability for the economic and environmental development of rural communities.	Acknowledged. Reference is made in Minister's Forward, 1.3.2, 3.1.1, 4.1, 5.4.1, 10.2.1, WV-E2	5.1.2 Insert at end “Their future relies on sustaining people's relationship to the land and its resources.”
3. CLA	General	Good land management is costly. Land management brings environmental benefits and can only continue and improve if farmland located within the AONB is economically sustainable. Thus the conservation of designated areas can only be achieved by appropriate positive management and this is best delivered by positive policies which provide for viable rural businesses. When designating land and developing policies the AONB must consider the needs of rural businesses and include the need for new housing development, services and other	Acknowledged. Reference is made in 3.1.1, 8.5.4, WV-F2, 10.2.1, WV-E2	No change

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		infrastructure, and how those policies will impact on rural businesses. Other considerations should include what additional resources could be made available to assist those businesses in the positive management of the countryside.		
3. CLA	General	Furthermore, recognition must be given to the changing nature of agricultural crops/enterprises (e.g. miscanthus and willow biomass) and the need to grow renewable energy crops to assist in the Government's renewable energy and climate change targets. In order to meet these targets, land managers farming in designated areas must not be prevented from growing renewable energy crops through the misuse of the England Landscape Character Assessment tool.	Acknowledged. Reference is made in 9.3.1. LCAs should not overrule Government renewable energy target, but developments based on those target do not overrule other policies.	No change
3. CLA	3.	Managing Change The CLA is very pleased that the management plan recognised that the countryside has evolved as a result of land management practices and that the management plan does not seek to fossilise the landscape.	Acknowledged	No change
3. CLA	3.2.4	The AONB should understand that farmers need to have economical sustainability to help them conserve and enhance the characteristics of the Wye Valley AONB. Many farmers in the AONB are conserving the landscape and increasing food production.	Acknowledged	No change
3. CLA	3.2.4	The CLA is concerned that the management plan sees development of traditional farm buildings purely as a threat. Development should also be viewed positively as reuse of land and buildings can deliver positive benefits in terms of the historic environment.	3.2.4 only refers to barns being converted 'sometimes unsuitably'. Accept benefits of conservation of historic environment.	Insert in Table 9: Activities & Pressures, for Agriculture. Positive Impacts in the AONB "Sensitive barn conversions can deliver positive benefits in terms of the historic environment"
3. CLA	3.3	In section 3.2.9 the management plan raises concerns that people who live in the AONB are not there during the day as they work outside of the AONB. However, in section 3.3.3 the management plan states that 10% of the residents work from home. If this is the case why is the management plan concerned about the AONB being a commuter area?	In some areas up to 10% work from home, but this is not a blanket statistic for the whole AONB, however it is a positive and	No change

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			increasing trend. Commuting out of the AONB is still a major feature of many communities.	
3. CLA	Table 9. Field Sports (Page 46)	Landowners and farmers work hard to improve the landscape and land managed for shoots generally has a larger population of farmland birds. The CLA is concerned that the AONB feel that cover crops can degrade the landscape, there are a number organisations advising on wildbird crops and the AONB should publicise this.	Positive impact that "Management can enhance biodiversity" is recognised. Emphasis of Negative Impacts is that "Poorly designed cover crops can degrade the landscape character". Agree good practice should be promoted.	Add to Action Plan: "Promote and publicise good practice advice on cover crop management for landscape and biodiversity gains"
3. CLA	Table 9. Agriculture (Page 48)	The CLA are concerned that the management plan states new technology is seen to have a negative effect on the AONB. New technology can enhance the AONB by improving soil quality and thus reducing run off. Some technology will maximise production allowing farmers to use fewer resources and also manage wildlife on their farms.	Accept that some new technologies can improve soil quality, reduce run off etc. However, the Plan refers to 'potential landscape, social &/or biodiversity impacts' which may occur from other new technologies.	Under Positive Impacts: add to 5 th bullet: "and/or new technologies"
3. CLA	Table 9. Agriculture (Page 48)	The CLA are very concerned that new farm buildings have been included in the negative impacts list. Farm businesses may need new buildings to meet current regulation; traditional farm buildings were once new in the landscape and it is important that the landscape evolves over time and does not become fossilised. Please see earlier comments regarding barn conversions.	3.1.1 states that 'It is neither possible nor desirable to fossilise a landscape'. See comments and response to 3.2.4 above.	Insert under Positive Impacts: "Sensitive barn conversions can deliver positive benefits in terms of the historic environment"
3. CLA	Table 9. Agriculture	In the section on positive impacts, there is no mention of Catchment sensitive Farming or the Campaign for the Farmed Environment.	Accepted	Under Positive Impacts: add to 5th bullet:

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	(Page 48)			"Catchment sensitive Farming or the Campaign for the Farmed Environment"
3. CLA	Table 9. Agriculture (Page 49)	Pressures on the AONB - Agriculture: traditional farm buildings are in many cases not fit for current farming systems, selling off traditional farm buildings allows landowners to reinvest in their businesses. Modern agricultural, horticultural and forestry buildings are by their very nature large, in order to meet the needs of the industry. The AONB should understand that farmers need to have economical sustainability to help them conserve and enhance the characteristics of the Wye Valley AONB.	Accept recognition of need to reinvest in business. 8.5.4 refers to economic viability of farming underpinning landscape conservation.	Modify 8 th bullet to "•Traditional farm buildings redundant for modern agricultural use sold off &/or converted, leading to reinvestment in business and modern agricultural buildings"
3. CLA	Table 9. Agriculture (Page 49)	<p>Traditional Farm Buildings Policies should encourage the conservation and enhancement of historic buildings, landscapes, and conservation areas. However, heritage is extremely expensive to maintain and such policies will not succeed unless there is economic viability. Conservation of the historic environment is not preservation as found; it is the process of enabling appropriate change to give the historic environment a sustainable future. The policies must therefore state unequivocally that economically-effective uses and the properly-considered changes needed to achieve them are essential and beneficial if heritage is to survive into the long term. CLA would like to see a positive flexible approach to the historic environment. Historic buildings should be reused and renewed making them viable for the future.</p> <p>A considerable percentage (2/3rds) of the historic environment is in private ownership in the region. It is often important for individual owners to secure an economic use of historic buildings and land in order to fund repairs and improvements of these assets. Therefore, it is extremely important that the policy allows and recognises the need for economic use of buildings and land.</p> <p>Whilst it is important to maintain historical landscapes it is also important for the policy to recognise how change can be managed, especially in the context of the pressure for change that will occur due to climate change and other pressure in the region over the plan period. The landscape in rural areas is influenced considerably by agricultural and forestry activities which are subject to many influences which bring about change. The policy needs to allow and consider how this change is managed and</p>	<p>Accept need to recognise cost and viability of heritage conservation. This is broader than an agricultural issue, therefore amend Historic Environment section (8.4) rather than elaborate further in Table 9.</p> <p>8.4.2 recognises the significant amounts of 'public, private & charitable finance invested into the management of the historic environment.'</p> <p>WV-H1 states: '...encourage...policy development, advice and sympathetic</p>	<p>8.4.2 Insert at end of penultimate sentence "...and financial viability."</p> <p>Insert on end of final sentence: "...along with properly-considered changes to achieve viable uses that enable the heritage to continue to survive."</p> <p>WV-H1 precede 'national agencies and other relevant organisations' with "landowners"</p>

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		not look solely at preservation. We would particularly recommend the document "Putting Historic Environment to Work" produced by the Historic Environment forum for the West Midlands.	management ... and positive action to conserve, enhance and promote the historic environment....' However should reference 'landowners' 'in conjunction with national agencies and other relevant organisations'.	
3. CLA	8.1 Landscape	Farmland and forestry management over centuries has led to our current diverse and world renowned landscapes. Land managers should be rewarded for maintaining landscapes through beneficial farming and forestry practises which should be encouraged by the AONB. Landscape qualities are increasingly used in marketing agricultural products and diversification enterprises, to ensure financial rewards for those who manage the character of areas such as AONB which are critical for recreation and rural tourism. The AONB should ensure that there is a flexible planning system to foster the development of thriving rural businesses. The AONB should raise the profile of local foods through industry and government initiatives to help generate income for the farmers and in doing so help to conserve the landscape character in the future.	Acknowledge that successive generations of land management have crafted the landscape. WV-L1, WV-L2, WV-B3, WV-F1, WV-F2, WV-F4, WV-F7, WV-E1 & WV-E2 all support land management and local food that maintains the landscape. Accept that landscape qualities are increasingly used in marketing agricultural products etc.	8.1.1 Insert after 'landscape' "crafted by successive generations of land management" 8.1.2 Insert at end "For example, landscape qualities are increasingly used in marketing agricultural products and diversification enterprises, securing financial rewards for those who manage the character of the area which also enhances recreation and rural tourism".
3. CLA	8.1.3	The CLA have a number of concerns regarding landscape character assessments, and are concerned that characterisation will lead to the imposition of unnecessary restrictive, prescriptive management policies. The CLA strongly objects to this as it	Concerns are noted. It is recognised that some sectors of	Replace final phrase from '... which can help...' with new sentence "These can

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		would lead to stagnation of rural areas.	society are increasingly resistant to change. However Characterisation is a relatively value free process that helps with understanding what makes one area different from another. Landscape Character Assessments are not intended to be restrictive, but to help inform management and identify the choices and opportunities to plan and monitor proactively for change in a dynamic and evolving landscape.	all help inform management and identify the choices and opportunities to plan and monitor proactively for change in a dynamic and evolving landscape.”
3. CLA	8.4	<p>Historic Environment CLA support the aim of the AONB to conserve the historic environment and promote sympathetic management.</p> <p>The AONB must find effective ways to work with and support private owners by providing enlightened policies and by recognising the levels of private finance that are invested into the management of the heritage environment.</p>	<p>Acknowledged</p> <p>8.4.2 recognises the significant amounts of ‘public, private & charitable finance invested into the management of the historic environment.’</p> <p>WV-H1 states: ‘...encourage...policy development, advice</p>	<p>8.4.2 Insert at end of penultimate sentence “...and financial viability.”</p> <p>Insert on end of final sentence: “...along with properly-considered changes to achieve viable uses that enable the heritage to continue to survive.”</p>

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			and sympathetic management ...and positive action to conserve, enhance and promote the historic environment....' However should reference 'landowners' 'in conjunction with national agencies and other relevant organisations'.	WV-H1 precede 'national agencies and other relevant organisations' with "landowners"
3. CLA	8.5 Farming	The AONB must recognise that agricultural, horticultural, forestry businesses, as well as diversified enterprises, have similar needs to all businesses in that they have to modernise to remain profitable and may have a genuine need for new buildings to meet the changing nature of the business in question. Modern agricultural, horticultural and forestry buildings are by their very nature large, in order to meet the needs of modern agricultural, horticultural and forestry operations. The AONB should understand that farmers need to have economical sustainability to help them conserve and enhance the characteristics of the Wye Valley AONB.	Acknowledge that agricultural businesses need to, and have always, adapted to remain profitable and the viability of enterprises enables land managers to conserve and enhance their holdings and their interests.	8.5.2 Insert as 2 nd sentence "Agricultural businesses have always adapted to remain profitable and the viability of enterprises enables land managers to conserve and enhance their holdings and their interests."
3. CLA	8.5 Farming	The AONB should fully recognise the role of agriculture, horticulture and forestry and the important changes taking place within these industries, not least their ability to provide for renewable energy crops in respect of policies for tackling climate change.	Acknowledge the provision of renewable energy crops as a contribution to replacement fuels in respect of policies for tackling climate change.	8.5.1 Insert in penultimate sentence after 'Supplementing the agricultural businesses are...' "renewable energy production and..." 8.5.3 Rephrase 1 st sentence to read: "The production of food and fuel are key ecosystem services but

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				must also be viable businesses.” Insert in 3 rd sentence after ‘different’ “technologies” Insert in 4 th sentence, after ‘...include the use of’ “photovoltaic (PV) arrays.”
3. CLA	8.5 Farming	In particular, the AONB must positively recognise the industry’s continued importance to the rural economy and its role as the main provider in the management of the rural landscape must be noted. Farmers should be supported in their role to manage the AONB, land managers and farming can provide both food and environment security in the future.	Acknowledged in 8.5.2 and 8.5.4	8.5.1 Insert to end of 1 st sentence “and continues to be an important part of the rural economy and a provider of rural landscape management.”
3. CLA	WV-F1	Farmers and rural businesses need to be economically viable so that they can conserve and enhance the landscape, otherwise the businesses and the active environmental land management they underpin, will cease.	Acknowledged in 8.5.2 and 8.5.4	No change
3. CLA	WV-F2	CLA supports objective WV-F2 to encourage the maximum uptake of agri-environment.	Acknowledged	No change
3. CLA	WV-F3	The CLA cannot support a policy that restricts the methods farmers need in order to meet the demands of the market place. We feel that it is more appropriate to look at mitigation through education rather than confrontation; it is inevitable that some development will be seen as unacceptable, but the AONB should work to look at mitigation instead of removal.	Agree there is a hierarchy of education, mitigation and/or reduction before confrontation and removal. However if the demands of the populous are not quantifiable in the market place methods may need to be controlled through other policy mechanisms.	Modify to read: “Seek to mitigate &/or reduce, or as a last resort remove, agricultural activity which significantly diminishes or destroys the Special Qualities, natural beauty and landscape character of the AONB
3. CLA	WV-F5	CLA believes that it is extremely important for the AONB to promote the wider understanding of farming to the landscape and the economy.	Acknowledged	No change
3. CLA	WV-F6	It is important that the AONB supports all appropriate measures to control disease of	Acknowledged	No change

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		agricultural animals, as these could threaten the commercial viability of grazing systems.		
3. CLA	8.6	We support the AONB's woodland policies	Acknowledged	No change
3. CLA	WV-D2	The higher standards, e.g. of design, sought in the AONB may add costs to developments. The CLA would recommend that the AONB provides guidance to show that good design will not affect building costs; so not to preclude businesses from diversifying.	The higher standards may affect initial costs but enable greater levels of sustainability that ultimately save costs.	Insert after '...to ensure' "greater sustainability and..."
3. CLA	WV-D3	The CLA view is that business must be allowed to develop to meet new business need/diversification and move forward to meet the market demands, the approach should be to look at mitigation rather than resistance.	Accept need for business development and appropriate mitigation. But social and environmental assets, such as nationally appreciated landscape, are sometimes not adequately valued in market demands	No change
3. CLA	WV-D4	Any such policy should be done in full consultation as this affects both urban and rural stakeholders including the CLA and NFU. If charges are set too high, development will be stifled. CLA feel there are likely to be consequences for the farming community who may be unable to afford the fees e.g. for new livestock buildings required for animal welfare reasons.	Acknowledged	No change
3. CLA	WV- U1	CLA supports the use of renewable technology in the AONB	Acknowledged	No change
3. CLA	WV- U3	CLA Supports the need for high speed broadband, however, care must be taken not to disadvantage the area by using the highest standards of design for infrastructure equipment that cost more.	Acknowledged	No change
3. CLA	WV- U4	CLA supports	Acknowledged	No change
3. CLA	10.2.1	Economic development in rural areas covers a wide range of development including: Agriculture, horticulture and forestry, mineral extraction, energy production, tourism development and the conversion of redundant farm buildings to retail, leisure and office use, and industrial and storage uses. Economic development in rural areas can also comprise other uses which are employment generators such as nursing homes, rural nursery schools and other types of businesses	Accept need to reference employment rather than development.	Modify 4 th sentence to "There is also employment in leisure and tourism, retail, energy production, light industrial, offices and storage plus other

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				providers such as nursing homes, schools, art galleries etc.”
3. CLA	10.2.3	The AONB must recognise the role that rural diversification and diverse rural businesses make to a viable rural economy. The AONB should encourage a mix of economic development in rural areas. The particular circumstances of the countryside can be respected by promoting well designed and suitably scaled developments, not by arbitrary restrictions on the type of development that can take place in rural areas.	Acknowledged. The last sentence endorses WV-D2	Insert in 2 nd sentence after ‘However...’ “the diversity of businesses makes for a mixed and viable rural economy and...”
3. CLA	10.2	AONB policies should not restrict the mix of development in the countryside. Development should not be limited to the location of public transport routes, because so much of the countryside and its economic success will always be dependent on the car and road based freight transport. The AONB should positively encourage a greater mix of economic development in the countryside, including rural tourism/leisure, renewable energy and other new uses of land and buildings.	Acknowledged	No change
3. CLA	WV-E2	The AONB needs to remember all pillars of sustainability; economic, environment, and social and these must all be in balance.	Acknowledged and elaborated on in 4.1	No change
3. CLA	11.1	The value of tourism is important to the economy of the county, bringing in more than £395 million to the economy every year and is one of the largest earning sectors of its economy. The CLA are pleased that the AONB are taking a positive approach to tourism, leisure and culture and support the policies in the plan.	Acknowledged	No change
3. CLA	11.2.2	Land managers should be provided with the ability to create, adapt and modernise public access to meet the needs of the 21st century user.	Acknowledge that these are wider national issues.	Insert new final sentence “Similarly public access needs to adapt and modernise to meet the needs of the 21st century user.”
3. CLA	11.2.4	The provision of public access should strike a sensible balance between the competing demands of access, the environment, rural businesses and private property rights. Access should link in with other policies like biodiversity.	Acknowledged	Insert at end of 3 rd sentence after ‘honeypots’ “or very sensitive habitats.”
3. CLA	11.2.2	The AONB should recognise that land managers provide a public service and incur costs when they provide access.	Acknowledged	Insert in 11.2.1 at end of penultimate sentence “...along with sufficient resources to manage and maintain that access.”

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3. CLA	11.2.2	The AONB should be careful how it manages access to avoid conflict between conservation, access and land managers. Access that is to be promoted should be done in full consultation with the landowner so the most appropriate action can be taken.	Agreed	Add to Action Plan "Access that is to be promoted should be done in full consultation with the landowner so the most appropriate action can be taken".
4. Philip Heath	General	<p>Although the reason for the strategic view is well understood, as a plan there needs to be more 'action' content. There is therefore a need to articulate the operational plan and where necessary furnish some detail on tactical aspects.</p> <p>It is quite clear that for all the good words (and there are many) it strikes me that the WVAONB organisation lacks empowerment. I was left with the resounding question in my head: "Yes – agreed – but what are you actually going to do?" You have comprehensively identified a raft of issues but I am not left with any confidence that they are going to be tackled to any appreciable degree; mainly because there is no operational level plan and you lack any authority. This could be addressed by lobbying for National Park status and representation on executive bodies such as planning committees.</p> <p>There are lots of verbs like: 'encourage' and 'support'. I would like to see verbs such as 'engage'.</p>	<p>This is a Management Plan for the AONB Partnership as a whole. Section 5 explains the legislative context of the AONB, the JAC and the AONB Unit. There are many decisions affecting the landscape over which the AONB Partnership has little direct influence, however it seeks to improve understanding to enable better decisions to be taken.</p> <p>The accompanying Action Plan is more specific and from which the AONB Unit Business Plan / Annual Work Programme is drawn.</p> <p>A National Park is its own Planning</p>	<p>Insert in 5.5.4 after 1st sentence "There are many decisions affecting the landscape over which the AONB Partnership does not have direct influence, however it seeks to improve understanding to enable better decisions to be taken."</p>

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			<p>Authority (although the South Downs National Park Authority delegated back to the Local Planning Authorities responsibility for day to day processing and determination of the great majority of all planning applications - about 96%).</p> <p>The political will, locally and nationally, to designate a new National Park is non-existent.</p>	
4. Philip Heath	9.3	<p>Much street and road lighting is unnecessary, energy consuming, costly, unattractive and causes light pollution. It appears that the current street and road lighting design is aimed at creating the atmosphere of a concentration camp.</p> <ul style="list-style-type: none"> The AONB Office will engage with the Highways Agency and Local Authorities to actively pursue a review of all street lighting with a view to the removal of unnecessary units and the replacement of unsightly units with those that have an aesthetic appeal and sit comfortably in their surroundings. All new developments must adopt an approach that puts aesthetics first. 	<p>Light pollution and aesthetics are recognised in Table 9 (Transport & Traffic), 9.4.2 and in the draft AONB Highway Design Guide, which references The Institution of Lighting Professionals Guidance note GN01, that recognises that AONBs are intrinsically dark landscapes. However, Highways authorities need to put public safety first.</p>	<p>Add to Action Plan "Monitor usage and review Highway Design Guide"</p>
4. Philip		Visitors, as well as some local residents feel the need to decorate the AONB with	Fly tipping is	No change

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Heath		<p>rubbish; especially along the verges of roads. Are District Councils and the Highway Agency doing enough to counter this? Not just in terms of clearing up (which they are not) but particularly in terms of prevention, including prosecutions.</p> <ul style="list-style-type: none"> The AONB Office will request that the Highways Agency and Local Authorities actively prosecute offenders and publicise the fact and hold such authorities to account if they fail to undertake their responsibilities in this regard. 	<p>recognised in Table 9. This is not an issue unique to the AONB. However action by relevant public bodies is considered part of their CRoW Act section 85 'duty of regard'. As a matter of course, the AONB Unit passes on to the relevant authorities any incidents of flytipping or excessive littering that it is aware of, and would expect other bodies & individuals to do likewise. It is not appropriate for the AONB Unit to duplicate other partner & local authority performance monitoring of services.</p>	
4. Philip Heath	WV-M3	<p>It should be mandatory that any new building is constructed from local stone and Welsh slate.</p> <ul style="list-style-type: none"> The AONB Office will request that Planning Committees commit to enforcing the utilisation of local stone. The AONB Office will discuss with landowners who have quarries the viability of extracting local stone and link this initiative to the planning criterion of using local stone in new constructions to promote local industry and prevent the erosion of local character in buildings, currently continuing apace. The AONB will identify and facilitate a source of subsidy to make it cost neutral to build with local stone. 	<p>9.2.3 recognises the heritage needs of using local stone. However mandatory use of stone & slate would seem disproportionate considering many characterful buildings, are also of timber frame and/or</p>	No change

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			brick. Mineral Planning Authorities and building companies liaise with quarry owners about the adequate supply of building stone. Public sector cuts make the likelihood of new subsidies extremely remote.	
4. Philip Heath	WV-D3	Most recent developments are diluting the character of the area. Planning departments, particularly Hereford, have a very poor track record on planning decisions and enforcement. Unfortunately at the Symonds Yat campsite the huge factory-like building, illuminated with flashing lights detracts very much from the natural beauty of the area – how did this happen? <ul style="list-style-type: none"> The AONB Office will pursue the removal of structures that violate the AONB. 	WV-D1, WV-D2 and WV-D3 refer to ensuring robust development and enforcement of planning policy. However, Planning is a democratic process and pursuing the removal of structures is the responsibility of the local planning authority.	No change
4. Philip Heath	WV-U2	The AONB Office will pursue the undergrounding of all power cables.	The undergrounding of all power cables is neither feasible nor desirable.	No change
4. Philip Heath	11.2.3	There is arguably too much river traffic already and much of it is unregulated. Motorised river cruises in particular stir up the silt and pollute the river especially when water levels are low and should be stopped. <ul style="list-style-type: none"> The AONB Office will seek to halt the motorised river cruises based at Symonds Yat. 	Table 9 (Boating & Canoeing) acknowledge the capacity issue. However, pollution from the limited number of motorised craft on the river is	No change

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			not recognised as a significant impact on the river - compared to say agricultural run off. Regulation of river craft is being addressed by the Navigation Authority for the Wye (the Environment Agency) and the Wye Navigation Advisory Committee. There is a public right of navigation on the river and the AONB Unit has no jurisdiction to prevent use of the river by vessels.	
5. Sustrans	General	Sustrans Cymru is supportive of this plan and the work that the AONB does. We will be very keen to work with the AONB in the future especially on Sustainable transport issues and how walking and cycling can be used to reduce the pressure of cars and trucks on this area and improve people's health and wellbeing.	Acknowledged	No change
5. Sustrans	3.2.6	I would however also raise the issue of sign clutter as mentioned in 3.2.6 and would urge the AONB and the local authorities to follow the guidelines set out in the DFT paper Traffic advisory leaflet (TAL) 1/13.	Acknowledged	Add to Action Plan "Monitor usage and review Highway Design Guide"
6. BSBI	8.2.7.	There is one small section that reads as very negative. The Wye Valley does have important assemblages of plant communities including species that are nationally rare or scarce (eg the Sorbus species - some new to science!). I feel there needs to be a more positive slant on our local flora	Accepted	Replce last sentence with "There are also species that are of local importance and although some species have been lost there is still considerable floral diversity in a range of habitats."

Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2014-2019
 Response to Consultation Draft comments (closed 31st January 2014)

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7. Forestry Commission	General	Trees and woodlands are clearly once of the most important features of the AONB and the plan reflects this.	Acknowledged	No change
7. Forestry Commission	1.1.3	Page 1 – It is worth noting that we recently undertook an economy study in the Marches on the value of timber to the local economy – the report is at http://www.forestry.gov.uk/forestry/INFD-997KCZ and flags up the opportunity for creating another 200 jobs through bringing more woods into positive management. We have also been looking at opportunities for woodland based ‘commercial’ recreation eg mountain biking, high wire etc in the Marches, some of which could be appropriate in the AONB. Both these contribute to developing a ‘Woodland Enterprise Zone’ approach referred to in the Government Forestry policy statement (Jan13).	Noted	No change
7. Forestry Commission	Vision	Page 6 - ‘where the distinctive mix of steep valley sides and rolling hills, covered with ancient and semi-natural <u>and other</u> woodland, mixed farmland, and scattered settlement dominate the landscape along with the meandering river’ Need to recognise the value of other woods eg non semi-natural broadleaved and coniferous woods and mixes in the landscape	Noted, however this phrase in the Vision refers to the mix of features that ‘dominate’ the landscape.	Insert in Special Quality 2. Woodlands after ‘Some plantation...’ “and other...”
7. Forestry Commission	3.2.1.1	Page 7 - Climate change: ‘Potential for new <u>pests and</u> diseases of crops, trees and livestock to establish’	Accepted	Amend
7. Forestry Commission	3.2.2	Page 9 - We should ensure that ‘growth’ is ‘excellent <u>and sustainable</u> growth’ and not something that people regret in the future	Accepted	Amend
7. Forestry Commission	3.2.5	Forestry: Timber prices, particularly for firewood are buoyant and markets strong – this is encouraging private owners back into managing their woods and there are grants available to improve the access for helping with increased harvesting and for producing robust management plans	Accepted.	Rephrase 3 rd & 4 th sentence to “Timber prices, particularly for firewood are buoyant and markets strong. This is encouraging private owners back into managing their woods and grants can assist with improving the access for increased harvesting and for producing robust management plans. However in many parts of the Wye Valley the woods remain under managed and

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				over mature.”
7. Forestry Commission	3.3.2. 3	Page 11 - Changes since designation: A change in forestry policy leading to replanting of conifer plantations, particularly on Ancient Woodland Sites with more diverse mixtures of trees.... Query on: Outside of the Forestry Commission land some felled areas appear to have been converted to other uses or allowed to grow into scrub this statement is not correct or needs to be reworded as we allow only for other habitats to be restored like heathland and not scrub	Noted. However this is a quote from a report (GCER 2013).	No change.
7. Forestry Commission	3.3.3	Page 12 - The <u>replanting of conifers in ancient woodland sites has significantly reduced in response to higher grants for broadleaves</u>	Accepted	Amend
7. Forestry Commission	Table 9 Forestry	Pressures: • Current low value of timber and lack of viable markets for wood products – not strictly true - see comment on 3.2.5 above	Accepted	Replace 1 st Bullet with “Timber prices, particularly for firewood are buoyant and markets strong”
7. Forestry Commission	Table 9 Forestry	Positive Impacts in the AONB: – note that removal of conifers actually reduces economic contributions as these are generally more marketable and in demand from processors eg sawmills Add: <ul style="list-style-type: none"> • economic generation of forestry products <u>increases labour and skills resource</u> • <u>trees help with flooding and water issues</u> 	Accepted	Add to 1 st bullet: “...increases labour and skills resource” Add to final bullet: “...flooding, water quality & quantity amelioration”
7. Forestry Commission	WV-F4	Page 67 - ‘...traditional skills such as hay making, hedge laying, dry stone walling, <u>woodlands, coppice management, riparian tree works</u> etc....’	Accepted	Amend
7. Forestry Commission	WV-F6	Page 67 - ‘Support all appropriate measures to control diseases of agricultural crops, <u>trees</u> and livestock....’	Accepted	Amend
7. Forestry Commission	8.6.8	Page 69 - add in ‘riparian tree corridors and/or wet woodland can help with some flooding issues and be an import resource for watercourse management and biodiversity, but are under threat, due to lack of management and tree health related problems. New woodlands would be an important asset in those areas to help with water management’	Accepted. But more appropriate added to 8.6.7	Insert as 2 nd sentence.
7. Forestry Commission	8.6.1	Add in (new section?): Woodland management is governed by the UK Forestry Standard and related guidance eg Managing Ancient and Native Woodland in England practice guide 2010, Open Habitats policy guidance and Habitats EPS guidance	The final sentence alludes to the English & Welsh policy context. Lists of policies relating to the	No change

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			AONB are included in the SEA,/ HRA and Environmental Report.	
7. Forestry Commission	11.2.4	Page 86 – add: ‘Woodlands and forests can play an important role in absorbing tourism and recreation pressure.’	Accepted	Insert after 2 nd sentence.
8. FoDDC	5.1.1	Include: ‘surface <i>an even smaller percentage of the world's marine environments are protected</i> . For completeness is the paragraph should include protected marine environments.	Accepted	Amend
8. FoDDC	5.4	New paragraph setting out the responsibilities of the individual and community organisations. The shared responsibility of communities and landowners should be reflected in the section.	Accepted. 5.4.1 goes some way towards this. But further elaboration could be made, and reference to “local communities” in 1.3.2	1.3.2 modify 2 nd sentence to “It also provides guidance to the local communities and many landowners, residents and visitors in the area.” Add new paragraph 5.4.12 “Local communities, including all people that live and work in the AONB, can play an active role in caring for the Wye Valley AONB. This Management Plan identifies some of the priorities for action and ways to get involved, including the Charter in section 12.2. This Plan can also aid community planning, by helping to inform neighbourhood and parish plans and community strategies. This will also help local Town, Parish & Community Councils fulfil their Section 85 ‘duty of

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				regard'."
8. FoDDC	5.5.2	Include names of local authorities. The Four Local Authorities should be named in this paragraph.	These are listed in the referenced Appendix 1 and 1.1.5.	No change
8. FoDDC	6.4.3	Include in paragraph how additional phase 1 habitat survey will be taken account of in Management Plan. Will the additional phase one information be available before the finalisation of the management plan? How will the management plan adapt if the information is or is not available before finalisation of the plan?	The Phase 1 data will not be complete before finalising the Plan. It will provide more definitive AONB wide breakdown of habitats, and evidence for project development, delivery and monitoring. However data gathering is an on-going process, as once the 20+ year old Monmouthshire Phase 1 is completed the Herefordshire data will 15 years old.	1 st sentence replace '...in each part of...' with "for". Add to end of 3 rd sentence "...to provide a more definitive AONB wide breakdown of habitats, and evidence for project development, delivery and monitoring."
8. FoDDC	Table 8 Special Quality 3.	The river & tributaries: Include area of floodplain; with reference to the 2 nd column the area of flood zone 3 should be included in the 3 rd column as it relates to ecosystem services in the final column.	Accepted	Insert in Extent column: "## ha of Flood Zone 3 floodplain".
8. FoDDC	Table 9 Community and Social	Include ' <i>impacts of out commuting</i> ' in pressures column. With reference to 2.1.6 & 5.3.3 the Community and social chapter of table 9 should include impacts as a result of out commuting.	Accepted	Add " , including out commuting," to 2 nd bullet point.
8. FoDDC	Table 9 Community and Social	Include ' <i>impacts of internet consumerism</i> ' on local services. An increasing amount of products and services are now purchased through the internet and delivered to the door. The opportunities and potential impacts of these should be reflected in the table. They included potential increase in delivery vehicles, loss of local shops and facilities, improved choice and deliverability for residents.	Accepted. However, uncertain whether deliveries of internet purchases increase vehicle movements or are off-set by reduction of shopping trips.	Add new bullet to Pressures column "Internet consumerism"

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8. FoDDC	7.1.4 – 7.1.6	Include ‘:-‘ after ‘The aim is’	Accepted	Amend
8. FoDDC	8.1.4	Missing link	Accepted	Amend
8. FoDDC	8.2.2	Delete ‘a’ in 3 rd sentence after ‘there is’	Accepted	Amend
8. FoDDC	8.2.2	Final sentence include ‘visitor pressure,’ and delete ‘and’. It should be recognised that some area, habitats or species may be susceptible to increased visitor pressure.	Accepted	Amend
8. FoDDC	8.4.1	Delete ‘of’ 3 rd sentence	Accepted	Amend
8. FoDDC	8.4.2	Delete 2 nd sentence. Whilst the meaning of the 2 nd sentence is accepted, the analogy does not add clarity. The first sentence makes the value clear.	Accepted	Amend
8. FoDDC	8.6.1	Text change ‘Sizeable’	Accepted	Amend
8. FoDDC	8.6	Include reference for wood as an energy source both as firewood or potentially biomass. Acknowledgement of woodlands providing markets for local energy source through fire wood as well as potentially biomass.	Accepted	8.6.3 penultimate sentence; add “and biomass” after ‘woodfuel’
8. FoDDC	8.6.7	Text change ‘Wherever’	Accepted	Amend
8. FoDDC	WV-D1	Recommend rewording: <i>‘Support and guide the development of a coherent framework of planning polices with planning authorities, to ensure policies are consistent with the special qualities of the AONB and their effectiveness is monitored.</i> Local authorities have a duty to co-operate with partners in and nearby their administrative areas. LPA’s and the AONB must develop land use policies that would influence the AONB co-operatively. It is also considered that the addition of special qualities adds focus to the implementation of the WV-D1.	The Management Plan belongs to the LPAs, therefore proposed text more appropriate for Action Plan where it can be allocated to the AONB Unit &/or JAC.	Add to Action Plan: “Support and guide the development of a coherent framework of planning polices with planning authorities, to ensure policies are consistent with the special qualities of the AONB and their effectiveness is monitored”.
8. FoDDC	9.3.3	Recommend rewording of 3rd sentence. <i>The waste of resources has both short term and long term effects. For example excessive lighting causes light pollution but also the resultant Co2 emissions from the electricity generation contributes to climate change.</i>	Accepted	Amend
8. FoDDC	9.4.3	Text change ‘work-life units’; Commonly referred to as live-work units.	Accepted	Amend
8. FoDDC	9.4.4	Text change delete ‘s’ after Beeching	Accepted	Amend
8. FoDDC	11.1.3	Recommend rewording <i>‘The recession in 2008-9 also hit consumer confidence, nationally the economy appears to be recovering but still fragile’</i> . The economy appears to now be stabilising and therefore the rewording is considered appropriate.	Accepted	Amend
8. FoDDC	General	The Forest of Dean District Council is very supportive of the Wye Valley AONB management plan for the period 2014-2019 (November 2013 Draft). I would like to	Acknowledged	No change

Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2014-2019
 Response to Consultation Draft comments (closed 31st January 2014)

Organisation / Name	Paragraph / Policy	Respondent's change or addition	Response	Recommendation
		thank AONB unit for bringing this very important document forward and enabling wide consultation on the draft.		
9. Chris McFarling	General	Much thought and research has gone into this Management Plan. It is expansive and comprehensive, befitting the depth and breadth of the landscape it covers. I wonder how much the usual constraints, political, economic or otherwise, have limited the plan's ambitions? It reads very much like a caretaker plan, sensitive to change; encouraging and supporting positive actions rather than reforming the systems which govern it.	This is a Management Plan for the AONB Partnership as a whole. Section 5 explains the legislative context of the AONB, the JAC and the AONB Unit. There are many decisions affecting the landscape over which the AONB Partnership has little direct influence, however it seeks to improve understanding to enable better decisions to be taken.	Insert in 5.5.4 after 1st sentence "There are many decisions affecting the landscape over which the AONB Partnership does not have direct influence, however it seeks to improve understanding to enable better decisions to be taken."
9. Chris McFarling	4.3	I acknowledge the use of ecosystem services to begin defining 'value' to the environment. I would be wary that those services were quantified in monetary terms as that would play into the biodiversity offsetting zeitgeist which ultimately devalues our rich natural heritage.	Acknowledged	No change
9. Chris McFarling	General	With Management Plans I'm familiar, four areas are covered, with varying degrees of success. Where are we now? (Research, surveys, baseline data, mapping, consultations etc.) Where do we want to get to? (Aims and objectives, sometimes a vision)How are we going to achieve these aims? (Action plan with timeframe, costings and outputs/outcomes)How will we know when we're getting there? (Monitoring and evaluation) I had trouble finding sufficient details of the last two areas - perhaps that's my fault for missing these aspects.	1.3.1 and 7.2.1 refer to the Action Plan being produced separately. This includes the Monitoring and evaluation programme.	Add to 1.3.1 and 7.2.1 "...and the monitoring and evaluation programme."
9. Chris McFarling	12.2	I liked the Charter for Residents and Visitors – well worth publicising. Thank-you for having drawn this document together and put it out for consultation. If 'owned' by those that live, work and visit the area, it has every chance of making a positive difference.	Acknowledged	No change

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10. GCC	WV-R3	Whilst we understand the desire to use appropriate materials for signage our experience is that the oak posts are too much of a temptation for local populace with chainsaws and the cost of continually replacing damaged ones is becoming prohibitive. Road side signage throughout the AONB, and elsewhere, is the usual highways standard grey metal posts and this will inevitably be our 'standard'.	It is recognised that in addressing the impacts of repeated vandalism the most sustainable design for signage may have to be standard metal posts.	No change
10. GCC	4.2, 4.3 and 4.4	At 4.2, 4.3 and 4.4 there is an appropriate summary of the ecosystem approach plus a focus on ecosystem services and the importance of landscape scale action which of course sits well within an AONB Management Plan. Setting this out at the beginning of the document is useful and gives context for the proposed policy of the new plan.	Agreed	No change
10. GCC	6.4.7	An observation is that strictly speaking there is no longer a UK Biodiversity Action Plan but it is useful background particularly for an AONB involving two of the four countries in the UK. It is just suggested the word 'former' is inserted before 'UK Biodiversity Action Plan'.	Accepted	Amend
10. GCC	8.2.5	Some mention of the establishment of new Local Nature Partnerships (LNPs) should be made as they are important groups on the English side for AONB Management to reference. LNPs could also be usefully referenced in section 12 of the plan.	Accepted	Insert at end: "Local Nature Partnerships (LNPs) in Herefordshire and Gloucestershire have been established through NEWP to work strategically on these outcomes." 12.1.2 Add after 2 nd sentence: "For example AONB staff both actively lead project steering groups and contribute to county Local Nature Partnerships (LNPs) and other fora."
10. GCC	8.2	The main treatment of biodiversity is to be found at 8.2 and is helpfully written using reference to designated sites plus priority habitats and species. Although County wildlife sites are part of objective WV-B2 the mention of locally designated wildlife sites (in Gloucestershire these are Key Wildlife Sites) is unfortunately missing from the body text. These sites are where the majority of biodiversity assets occur. Some	2.1.3 references '...204 County local wildlife sites'. Table 8: Special Quality 4.	Insert "/key" after 'local' in every reference to 'County local wildlife sites'.

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		recognition of them should be made in the body text and maybe reference to the data on their condition (Figures submitted annually to Defra for English counties).	Recognition column references '133 CLWS' (County local wildlife sites). 8.2.1 states "...204 County local wildlife sites, a few of which are managed as nature reserves....".	
10. GCC	WV-B1 to WV-B6	The Strategic Objectives for biodiversity on pages 62 and 63 are comprehensive and sound.	Acknowledged	No change
10. GCC	9.4	It is noted in section 9.4 (Transportation) there is an objective (WV-T3) that covers managing verges for biodiversity. It would be good if there was some reference to the various schemes or not for registering important roadside verges for biodiversity in counties is given some reference in the body text. The reference for the County of Gloucestershire is a special register which can be found at: http://www.gloucestershire.gov.uk/extra/article/109520/Biodiversity-and-Highways .	Accepted, along with the need for some greater explanatory text on transport corridors for wildlife.	Re-number 9.4.8 to 9.4.9 and insert new paragraph at 9.4.8 "Transport corridors are rarely managed with wildlife in mind, despite the fact that they are linear features with the potential to act as corridors for wildlife as well as vehicles. Vegetated verges can support a diverse range of rough grassland and scrub species if managed in the right way. Depending on the flowers present, grassland verges may be best cut either once in late summer or twice; in both spring and early autumn. This ensures that tall plants do not cause unnecessary visual obstruction for vehicles, whilst allowing rare and native species to thrive

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				and set seed. It is also desirable to remove the cuttings as this reduces soil nutrients, allowing rare wildflowers that thrive on poor soil to emerge. There are various schemes in each County for registering important roadside verges for biodiversity, usually through the local authority or wildlife trust.”
10. GCC	WV-M1	It should be noted that it is the responsibility of the Minerals Planning Authority to set the framework for ensuring a steady and adequate supply of minerals in accordance with the NPPF. All issues such as the impacts of quarrying on constraints will be balanced through the statutory plan process. The Minerals Local Plan for Gloucestershire is currently under revision and the AONB management boards are key stakeholders in the consultative stages of the plan preparation.	Noted	Insert at end of 9.2.4 “All issues such as the impacts of quarrying on constraints will be balanced through the statutory plan process.”
10. GCC	9.2.4	Following on from the comment on WV-M1, this paragraph is no longer wholly consistent with NPPF. It is the intention of the NPPF (paragraph 145) that Minerals planning authorities should plan for a steady and adequate supply of aggregates by preparing an annual Local Aggregate Assessment based on a rolling average of 10 years sales data and other relevant local information, the former published national and sub-national apportionments are now considered as guidelines. It is suggested that the last sentence of paragraph 9.2.4 be replaced with the following: “Each MPA is responsible for planning for a steady and adequate supply of aggregates in accordance with the NPPF.”	Accepted	Amend
10. GCC	General	Overall the document is to be commended. The definition of natural beauty (1.2.1), statement of significance (2.1) and vision (2.2) acknowledge the importance of the historic environment and set the context for the remainder of the plan.	Acknowledged	No change
10. GCC	Table 9	Within Table 9: Activities and Pressures (from P45) several activities listed include potential negative impact on the historic environment and individual heritage assets (described as landscape and features) but there are several further activities where this could be mentioned in the table. These are: horse riding, sight-seeing/tourism, and particularly agriculture and forestry. As these are activities that cannot generally be	Accepted. Section 4.4 emphasises that ‘landscape’ includes the historic environment and	Insert in Negative Impacts column, for:- Horse riding: 2 nd bullet; add “and features”, Sight-seeing: add new

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		managed through planning policy the recognition of their potential impact could usefully be acknowledged at this point in the plan.	cultural heritage assets. Table 9 Negative Impacts of Agriculture already acknowledges "Inappropriate land management practices may degrade or destroy landscape features..."	bullet; "• Can exacerbate erosion to path surfaces and features" Forestry: add to end of penultimate bullet; "may degrade or destroy landscape features"
10. GCC	8.1	The strategic objectives for Landscape are strongly supported.	Acknowledged	No change
10. GCC	8.4	The strategic objectives for Historic environment are strongly supported.	Acknowledged	No change
10. GCC	8.5	The strategic objectives for Farming are strongly supported.	Acknowledged	No change
10. GCC	9.3	The strategic objectives for Public utilities are strongly supported.	Acknowledged	No change
10. GCC	11.1	The strategic objectives for Sustainable tourism are strongly supported.	Acknowledged	No change
10. GCC	11.2	The strategic objectives for Recreation are strongly supported.	Acknowledged	No change
10. GCC	11.3	The strategic objectives for Understanding are strongly supported.	Acknowledged	No change
10. GCC	12.1	The strategic objectives for Partnerships are strongly supported.	Acknowledged	No change
10. GCC	8.4.1	The reference to significant undesignated heritage assets is important and should be retained.	Acknowledged	No change
10. GCC	8.6	Trees themselves and modern forestry operations can cause significant damage to individual heritage assets but there appears to be no mention of the appropriate management of significant features in woodland within section 8.6. A clause to this effect is recommended.	Accepted	8.6.7 Insert as last sentence; "However, appropriate management is required as trees themselves and modern forestry operations can cause significant damage to individual heritage assets."
11. GGAT	General	We welcome the management plan's aim of conserving the historic environment and the promotion of sympathetic forms of management. However, we have identified a number of issues that should be addressed in the final version.	Acknowledged	No change
11. GGAT	1.2.1	Consideration might be given to expanding paragraph 1.2.1 slightly, to note that when the	Accepted	Insert in 3 rd sentence after 'However,' "since 1968

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		Countryside Act was drawn up in 1968 there was very little understanding of the fact that the 'natural' landscapes of the British Isles are in fact the product of millennia of human intervention, and that it is increasing recognition of this in the following decades that has led to the revised definition.		the recognition and understanding has developed that 'natural' landscapes of the British Isles are in fact the product of millennia of human Intervention. Therefore..."
11. GGAT	5.2.4	There is some disparity in the extent to which documentation that applies in Wales is cited, as opposed to that for England. We note that paragraph 5.2.4 should also include mention of the Policy Statement for Protected Landscapes, which was issued by the Welsh Government in draft in 2013	Accepted	Insert new 2 nd sentence "Welsh Government also issued a Policy Statement for Protected Landscapes in draft in 2013."
11. GGAT	Table 8	A few salient facts are missing from: o No.15 (Medieval defensive and ecclesiastical sites el al): the 'Recognitions' box should include a count of Scheduled Monuments: the 'Changes or threats' box should also include 'Inappropriate land management may degrade or destroy archaeological features'. o No.16 (Post-medieval industrial sites el al): the 'Recognitions' box should include a count of Scheduled Monuments.	SM period data only in Wales?? Accept addition to Changes or threats	Amend
11. GGAT	Table 9	'Negative Impacts' omitted 'Tourism' should also include 'High levels of footfall at popular archaeological sites and monuments can lead to erosion'.	Accept principle, which is already recognised under 'Walking', but also more applicable to 'Sight-seeing' than wider 'Tourism'	Insert 'Negative Impacts' for Sight-seeing: "Can exacerbate erosion to path surfaces and features, including archaeological sites and monuments".
11. GGAT	Table 9	'Negative Impacts' omitted 'Agriculture' should also include 'Inappropriate land management may degrade or destroy archaeological features'.	Accepted, although archaeological features are part of landscape features.	Add to 2 nd bullet point "including archaeological features"
11. GGAT	Table 9	'Negative Impacts' omitted 'Forestry' should also include 'Inappropriate land management may degrade or destroy archaeological features'.	Accepted, although archaeological features are part of landscape features.	Add to penultimate bullet "including archaeological features"

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11. GGAT	Table 9	'Negative Impacts' omitted 'Energy, including renewables, should include 'Re-use of historic mill locations can cause damage to historic structures and archaeological deposits' .	Accepted	Amend
11. GGAT	8.4.1	Paragraph states' Additionally there are some nationally and regionally important monuments in the AONB that are not designated ... ' We believe that it would be more accurate to alter this description from 'some' to either 'many' or 'many more' in order to better communicate the quantity and diversity of archaeological sites within the AONB. This would also help to highlight the need for adequate consideration to be given to the possible impacts on historical assets from other objectives and activities discussed within the plan.	Accepted	Change 'some' for "many more" in last sentence.
11. GGAT		We are concerned about the lack of specificity contained within the stated objectives given within section 8.4 (WV-HI, WV-H2, and WV-H3), which stands in marked contrast to the detail given in other sections, such as section 8.5 (Farming) and section 8.6 (Woodland, Trees and Forestry). For example, in WV-HI, no attempt appears to have been made to identify any of the schemes, policies or partnerships that might be encouraged or investigated. Similarly, WV-H2 seems only to refer in vague terms to promoting the establishment of baseline data, while WV-H3 reads as if it were more an aim than an objective. We believe that each of these, as currently presented, could be divided into more clearly defined and achievable objectives. This would help enable the plan's stated aim to be attained, and would bring some degree of parity between the plan's consideration of the historic environment and its other topics.	The historic environment is an integral part of the landscape and recognised in half of the Special Qualities [SQs:4, 11, 13, 14, 15, 16, 17, 18, 19, 20, 22, 23, 26, 27] which are cross referenced in many other Strategic Objectives, eg WV-L1, F1, F2, F3, F4, W2, D3, M3 etc. WV-H2 contains a specific list of databases from which baseline data should be drawn. The identification and delivery of schemes and partnerships is part of the Action Plan.	Insert in WV-H2 [see also "WV-L4"]

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11. GGAT	Table 8	We recommend that SQ II contain a specific reference to the threat of inappropriate development, such as large (75m+) single wind turbines. Although the plan refers elsewhere to large wind farms and to the sympathetic use of renewable energy, existing planning legislation is currently lacking in its ability to adequately control developments of large single turbines, and there have been several cases of such developments being approved in highly visible locations despite opposition from landscape, conservation and archaeological officers. While the AONB does not have planning authority, a clear policy statement within the management report would help to enable local authorities to incorporate adequate controls within their LDPIDPDs.	Accepted	Insert at end of 'Changes or threats' after '...viewed from a viewpoint' "including large single structures"
11. GGAT	12.2	We suggest that an additional action might be added to the Charter: 'Help report damage to geological, ecological, archaeological and historic features'.	Accepted	Add to end of 12.2.12 "Meanwhile, help report damage to geological, ecological, archaeological and historic features."
11. GGAT	3.1.3	We note that the third sentence in paragraph is incomplete.	Accepted	Replace 'Endeavour' with "The challenge is..."
12. GOT	General	<p>1. The Gloucestershire Orchard Trust (GOT) welcomes this opportunity to respond to the Wye Valley AONB Plan. We represent a broad range of interests with an involvement in or dependence on, the many different contributions orchards - particularly surviving traditional orchards - make to their lives and livelihoods. Our submission is made against a rapidly changing scene, both nationally and locally, for orchards and their produce, and the consequent problems which threaten their existence.</p> <p>We believe this situation is not being recognised with sufficient attention or consideration within the planning system, to the detriment of our economy, environment and heritage.</p> <p>2. We appreciate that the draft plan recognizes traditional orchards as valuable habitat, so often missing from other local plans. Our area of expertise is best deployed in emphasizing the tremendous role and importance, now and in the future, of orchards, both in Gloucestershire as a whole and, in particular, the Wye Valley and Joint Core Strategy areas (of Gloucester, Tewkesbury and Cheltenham).</p> <p>3. The Gloucestershire Orchard Trust's main objectives are to conserve, promote and celebrate the county's rich heritage of orchards and the varieties they hold. All types of fruit are included - apples and pears of all kinds, plums, cherries, even nuts. GOT is part of a national network of similar organisations dedicated to similar objectives. We were formed to help counter the severe loss of mainly traditional orchards which has occurred over the past 50 years. It is widely accepted - and supported by sound</p>	Acknowledged	No change

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		<p>research data - that around 70% of such orchards have now disappeared from the county and that this figure continues to grow. The traditional orchard in Gloucestershire is now an endangered feature.</p> <p>4. The impact of such losses is measured in terms of greatly diminished...</p> <ul style="list-style-type: none"> * local landscape and amenity in terms of quality, diversity and character *wildlife habitats, including Red Data species *cultural and historical features * economic and business opportunities *genetic diversity through losses of historic local varieties of fruit. 		
12. GOT	6.4	The Peoples Trust for Endangered Species, with our assistance in Gloucestershire, have now mapped traditional orchards across the entire UK, including Wales and England and this would include the Wye Valley www.ptes.org . This detailed survey data also includes remnant orchards.	Acknowledged. This data will be utilised in the State of the AONB Report	No change
12. GOT	8.6.8	We particularly need to be mindful of not only orchard fragments on the edge of settlements, but also of solitary veteran fruit trees, particularly as they may hold a rare genetic resource.	Accepted	Insert at end of paragraph
12. GOT	Table 8	<p>There has just been launched a national survey for the pear; in our region this includes perry pears, which are particularly long-lived (up to 400 years) and vulnerable to habitat loss.</p> <p>Up to 1800 species of fauna and flora have been recorded in traditional orchards by Natural England.</p> <p>Although orchards have National BAP priority habitat status, they are still extremely vulnerable to loss.</p> <p>The reasons for such a steep decline in one of the county's most iconic landscape and cultural features are many and varied. Among the most common are...</p> <ul style="list-style-type: none"> * the spread of new agricultural and horticultural practices driven by technical and land use change * shifts in the economic climate for fruit growing and marketing regimes * steady erosion of redundant or underused orchards and their trees - especially isolated or single trees - through lack of, or inappropriate, management practices, weather damage or harmful grazing by stock, particularly horses * lack of awareness of the value of old orchards by their owners, especially following changes in land title or new landlord/tenant relationships. <p>GOT has a proactive programme of activities to try and tackle each of these aspects, the details of which can be seen on our website.</p> <p>In addition to the list of problems impacting on the county/region's orchards, there is</p>	<p>Accepted: Insert new 'Orchards' Special Quality [SQ27];</p> <p><i>Recognition:</i> Traditional orchards mostly cider apples and perry pear also commercial standard apple and bush orchards</p> <p><i>Extent:</i> Throughout AONB, dependant on geology and topography. New commercial orchards being planted.</p> <p><i>Condition:</i> Many traditional orchards redundant or underused.</p> <p>New commercial</p>	Amend

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		<p>another, no less important, reason - that related to planning and development pressure. Over the past 20 years there have been many instances of traditional orchard loss arising from development, quite often despite legal protection being afforded to certain orchards or specific ancient trees. This is particularly worrying.</p> <p>We believe that the Wye Valley AONB Management Plan should include the protection and conservation of traditional orchards as a specific objective within these policies. Without such explicit references there is little doubt that the current rate of decline and loss of orchards will continue, and more than likely, increase.</p> <p>GOT acknowledges that, given the nature of the current pressures on land use, especially for housing and local industry, there cannot be blanket protection given to all traditional orchards. But we believe that the status of such orchards need to be raised and their place in the overall fabric of our countryside strengthened within the local planning framework. As a consequence, it should be possible in many more cases, for old orchards to be given, for example, a new community focused future alongside new development, rather than be seen as a removable feature of little consequence. There is also a revival of individuals and community groups using the harvest once again, for juice, cider and perry. GOT can advise on all these issues.</p>	<p>planting of bush orchards</p> <p><i>Changes or threats:</i></p> <ul style="list-style-type: none"> -Lack of, or inappropriate, management practices, weather damage or harmful grazing by stock, particularly horses -Development of land for housing. 	
13. FoD BPT	2.1	I do wish that Wye Valley and Forest of Dean could be viewed as one, particularly when considering historic environment, but perhaps this is beyond the scope of this document	Acknowledged	Insert in 8.4.3 after 1 st phrase of 1 st sentence: "The heritage of the Wye Valley is also closely linked with the neighbouring Forest of Dean."
13. FoD BPT	8.4	Is sufficient mention made of sustainability? 8.4.2 correctly comments that some sites are not in the best condition. We are all concerned that merely correcting this is insufficient if those same sites are then allowed to return to the same state. Repeated input of large capital sums is not an option. I think the Strategic Objectives WV-H1 must emphasise the need for sustainable conservation, enhancement etc. We all know this, but better to say so.	Accepted	Insert at end of 3.4.2 "However management must focus on sustainability rather than a cycle of repair and decay."
13. FoD BPT	8.5	The traditional Orchard is widely recognised for its wider ecological value, but its value as a rapidly diminishing genetic resource is not always appreciated. In common with most areas of agriculture, modern methods are selective in the varieties of fruit planted. Our old, often undervalued small orchards still contain many of these rare fruit varieties (pears can live for well over 200 years) and nobody can predict which may have genetic values that could be of great benefit to plant breeders particularly at	Noted. See GOT Table 8 comments. New 'Special Quality' on Orchards. <i>Changes or threats</i> include neglect,	Amend

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		this time of rapid climate change. The AONB area contains very many old and often neglected orchards that are not valued as highly as they deserve. They are particularly at risk through development pressures as they are generally found in the proximity of existing settlements, but also from their value for grazing the family pony. Not sure whether this is relevant to Farming, Historic environment or Biodiversity Strategic Objectives.	development and grazing pressure, <i>Ecosystem Services</i> include Genetic resources	
13. FoD BPT	11.1	Sustainable Tourism Strategic Objectives: I am interested in the connectivity of our heritage and how this may be a link to develop sustainable tourism. Wye Valley and FoD has many scattered heritage sites. The link to connect and promote them is as challenging as their maintenance. To explain, we can show how growth of one area led to development in another area. An example: Growth in popularity of Cider/perry when war prevented import from continent (1640) ... led to quest for improvement ... led to development of stronger glass able to withstand pressure of fermentation (in Newnham on Severn) (1640s) ... due to use of coal in furnace not charcoal ... led to use of coal fired in blast furnaces for iron (Whitecliff) replacing charcoal (Gunns Mill) Similarly; Growth in popularity of Cider/perry when war prevented import from continent (1640) ... led to quest for improvement ... led to improved milling/pressing of fruit ... led to demand for stone (quarries) along Wye Valley to supply millstones similarly transport etc etc The story links agriculture to industry and site to site, spreading the benefits of the tourism market and broadening the wider public interest of the features that are unsustainable in their own right.	These links can be pursued through <i>11.1.7 E. Celebrating Heritage: To promote enjoyment and understanding of the special heritage of the Wye Valley, building on the legacy of Overlooking the Wye</i>	No change
14. Les Lumsdon	General	The document presents a very thorough overview of the ongoing work and challenges facing the Wye Valley AONB and in particular points to the need for a wide range of partners to engage in the process of conserving the special environment that we cherish. This approach is essential for the core staff level of the AONB is low and budgets to support the staff team equally limited.	Acknowledged	No change
14. Les Lumsdon	General	I consider that the Plan covers the main issues and sets out strategic direction in a coherent manner. There are, in my opinion, no omissions, and the level of balance in the document is admirable if for no other purpose than guidance to partners, businesses, community organisations and interested individuals.	Acknowledged	No change
14. Les Lumsdon	3.2.6	There is a comment regarding roads becoming busier. However, recent work by Dr Metz, former chief scientist at the Department for Transport and Visiting Professor at University College, London, points to 'peak car travel'. He has analysed travel data for the past three decades and concludes that average travel distance and amount of time spent on travel by car is reducing-it may well have peaked even in the Wye Valley	Accepted	Delete 'roads continue to be busier and may consequently be noisier' and insert new 3 rd sentence: "Similarly 'peak

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		AONB.		car' use may have been reached as nationally the number of car miles per person has levelled off or declined since the mid-1990s but the influences of wider economic, social, cultural and spatial factors are complex, and growth in rural areas has remained static or is increasing.”
14. Les Lumsdon	3.3.2	The decline of orchard cover in the AONB is a major concern and perhaps measures to redress this matter needs to be highlighted later in the strategy, i.e. community orchards, local cider maker requirements, etcetera	Accepted. See Response to GOT re: Table 8.	New Special Quality [SQ27] for Orchards inserted
14. Les Lumsdon	7.1.2	Again, perhaps stress on deciduous woodland and re-planting or re-juvenation of orchards needs to be prioritised	Noted. Amend Woodland, Trees and Forestry Aim here and 8.6	Modify 7.1.2 final bullet and 8.6 Aim to read “To ensure woodlands and trees throughout the Wye Valley AONB are managed...”
14. Les Lumsdon	9.4	The discussion leads to only three objectives. I would prefer to see the smart travel or non motorised modes tied into the first objective as they are truly sustainable modes for short distances, and then a second objective to ‘Seek to encourage an upgrading* of public transport provision into and within the AONB from railheads so as to afford modal shift from the car for visitors and residents’. (By *upgrading I mean the maintenance of service levels at the very least, but more-so improved quality, information at bus stops and stations, etcetera. For example, there's a push for the Ross to Hereford bus to start from Hereford Railway Station rather than at the Country Bus Station. This is a small but important step to make access by public transport more convenient from the Midlands, Greater Manchester and London...i.e. low cost high value project)	Accepted in part.	Modify WV-T1 to read “Encourage and promote greater use of more sustainable and smarter forms of transport in the AONB and for accessing the area, including from railway stations, so as to afford modal shift from the car for visitors and residents, subject to WV-D2 and WV-D3 Add proposed 2 nd objective to Action Plan.
14. Les Lumsdon	11.1	Much is made of early tourism development and perhaps it is worth spelling out the elements that make tourism sustainable in the Wye Valley AONB...staying in the locality rather than using it as a touring base, using local products and spending time	Accepted	Insert new 1 st sentence in 11.1.7 “Key elements that make tourism more

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		to get to know local heritage, communities, ways of life, etcetera.		sustainable in the Wye Valley AONB include visitors staying in the locality rather than using it as a touring base, using local products and spending time getting to know local heritage, communities, ways of life, etc.”
15. Richard Newhouse	9.4.5	Cycling. Related to section 9.4.5 and WV-T1, also the Tourism & Recreation sections. I am one of those who cycled up the A466 many years ago on my way from Lands End to John O Groats! I do notice that the A466 is a busy road, with quite some heavy lorries. In parts it is fast (e.g. either side of Bigsweir Bridge) and in parts narrow (on the bends between Tintern & St Arvans) so I would nowadays regard it as quite a dangerous road for cycling. Perhaps the management plan could mention the safety aspects of encouraging cycling, and say something about balancing both the different types of road user, and also the trade-offs between highway development (more signs, cycle lane markings etc) and the desire to reduce road furniture? As a newcomer I find it basically bizarre that the old railway has not been made into a cycleway, at least a gravel one, between Tintern Old Station and at least Redbrook. If it could get to Monmouth (on the WV Walk route or the old railway route into Wyesham) it would link to Hadnock Rd & the Peregrine Route, and there would be a lovely route from Symonds Yat to Tintern. But everyone says it's too difficult....	Accepted	Insert “However the A466 is at times and in certain places busy, fast and narrow so can be regarded as quite a dangerous road for less experienced cyclist and drivers.”
15. Richard Newhouse		There is a risk that the publicly funded bodies which provide the infrastructure (e.g. maintaining footpaths & canoe launch places, running TICs) reduce their commitment though budgetary pressure, and they get no direct benefit from the users - they are just a cost centre. I don't really know how (there was a brief mention of a kind of 'tourist tax') but perhaps more could be done to align the interests of users (and private companies which operate tourist & recreation businesses) and the infrastructure providers.	WV-S3 7 WV-S4 allude to the potential of 'visitor giving' schemes. But much more research needs to be done on the effectiveness of such schemes. This is better located in the Action Plan.	Add to Action Plan “Investigate the viability of establishing a 'visitor giving' scheme in the AONB, &/or for a specific project or location.”
16. MCC	General	There is a lot of reference to Ecosystem services - as you know in MCC we are trying to look at a holistic way of delivering this, that will engage with the approach coming through the Environment Bill, link with NRW's designated remit and associated	Acknowledged	No change

Organisation / Name	Paragraph / Policy	Respondent's change or addition	Response	Recommendation
		<p>funding pots coming through WG but will also work for us as a council enabling us to work more efficiently and effectively.</p> <p>To date we see Green Infrastructure as a mechanism which can deliver the Ecosystem service approach in a holistic way – as you know we have developed an LDP policy and are in the process of producing supporting SPG. This approach has been developed more widely across the border already.</p> <p>This approach would be consistent with many other emerging AONB management plans - good example such as Hampshire.</p>		
16. MCC	3.2.1.3	<p>Climate Change - paras 3.2.1.3 & 3.2.1.4 would benefit from the following amendments to broaden the scope of climate change impact. I suggest the following re-wording for para 3.2.1.3 ; “ Ecosystem services will allow a holistic approach to mitigation and adaptation. Green Infrastructure provides a clear mechanism for the delivery of this approach through which landscape, biodiversity, accessibility and quality of life benefits are supported through sustainable communities. Green Infrastructure has a vital role to play in tackling climate change in the AONB by;</p> <ul style="list-style-type: none"> • Promoting ecological connectivity and robust habitats allowing for the movement of species (e.g pollination action programme) thus sustaining diversity. • Encouraging restored habitats e.g woodlands/vegetation to help reduce flooding and offset air pollution whilst also conserving the key features and characteristics which have led to the AONB designation that make it so attractive to locals and visitors today. • Supporting sustainable urban drainage methods to absorb excess rainfall and ensuring the character of the designation is not degraded. • Promoting space to grow foods using sustainable methods thus contributing to healthy diets for local communities but also enhancing biodiversity as well as providing jobs and educational benefits. • The safe guarding of accessible green space which helps reduce the effects of urban heat islands and also contributes to peoples sense of health and well being as well as having economic benefits relating to tourism vital to support the AONB. • Reducing carbon emissions through encouraging alternative modes of transport by walking and cycling whilst also supporting tourism a vital economic driver for a sustainable AONB. 	<p>Noted, however Green Infrastructure follows concepts and context of ecological connectivity and landscape scale approach, not visa versa. Therefore additions need to follow and augment paragraph 3.2.1.3. Consequently needs rephrasing.</p>	<p>Insert as new para 3.2.1.4 ”Green Infrastructure is a clear mechanism that delivers ecosystem services in which landscape, biodiversity, accessibility and quality of life benefits are supported through sustainable communities. Green Infrastructure can therefore play a vital role in tackling climate change, by:-</p> <ul style="list-style-type: none"> •Sustaining diversity by promoting ecological connectivity and robust habitats. •Restoring habitats e.g woodlands/vegetation, to help reduce flooding and offset air pollution whilst also conserving the key features and characteristics which have led to the AONB designation that make it so attractive to locals and visitors today. •Providing sustainable

Organisation / Name	Paragraph / Policy	Respondent's change or addition	Response	Recommendation
				urban drainage to absorb excess rainfall and ensuring the character of the river is not degraded. •Contributing space to grow foods using sustainable methods thus promoting healthy diets for local communities but also enhancing biodiversity, providing jobs and educational benefits. •Safeguarding accessible green space which helps reduce the effects of urban heat islands and also contributes to people's sense of health and well-being as well as having economic benefits relating to tourism. •Reducing carbon emissions through encouraging alternative modes of transport by walking and cycling whilst also supporting health, well- being and tourism.
16. MCC	3.1.2.4	And the following amendments to para 3.1.2.4 last sentence delete and replace with ; "This all needs to be backed by a strong evidence base and the monitoring of impacts when and where they occur."	Acknowledged, however the results of the monitoring also needs to be relayed to policy makers.	Rephrase final sentence to "This all needs to be backed by a strong evidence base, the monitoring of impacts when and where they occur and transferring the knowledge to the policy

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				makers.”
16. MCC	3.2.8	Add a last sentence “ A Green Infrastructure approach when considering development would allow the holistic consideration of a wide range of aspects which ultimately would contribute to the primary aims of the AONB.”	Accepted	Insert at end “A Green Infrastructure approach when considering development would allow the holistic consideration of a wide range of aspects which ultimately would contribute positively to ecosystem services and the AONB.”
16. MCC	4.4	I note the North Wessex Downs has produced a nice table showing the relationship between key natural services and the key characteristics of the Downs - I believe we could do something like this using the LANDMAP data and the Landscape characterisation data if you thought it was useful ? http://www.northwessexdowns.org.uk/uploads/docs/manplan/North%20Wessex%20Downs%20AONB%20Management%20Plan%202014-19%20Consultation%20Draft.pdf	Noted. Table 8 catalogues the Ecosystem Goods & Services provided by each Special Quality. A matrix of these could be provided.	Investigate value of inserting matrix Ecosystem Goods & Services provided by each Special Quality.
16. MCC	4.5	The setting of the AONB - I note other plans have positions statements on this – which could be really useful – we are happy to help with this .	Noted. Setting is included in WV-D2	No change
16. MCC	5.2.4	Natural England have produced a position statement on the implementation of the ELC requirements which is based on the Natural Environment White Paper and various updates such as that issues in Nov 2013 – where there are lots of implications for Landscape - reference to this and how it relates to the AONB landscape needs to be incorporated.	Natural England's Position on Protected Landscapes (April 2010) and Welsh Government's Policy Statement for Protected Landscapes (2014) both emphasise the relevance of the ELC to Protect Landscape management.	Amend and insert new 2 nd sentence “NE's Position on Protected Landscapes (April 2010) states “This holistic and interdisciplinary [ELC] approach is at the heart of managing AONBs and National Parks in England. It emphasises the integration of people and nature over time, and the importance of involving local communities living in or near to them in their management.” Welsh Government also issued a

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				Policy Statement for Protected Landscapes in 2014 which notes "The Convention recognises the importance of all landscapes but also supports international systems of planning, management, conservation and protection for nationally important landscapes.""
16. MCC	6.3	The various sections listed here and the tables associated contain really useful information. There might be a way of extracting some key points from each which could be used more effectively by policy and dc work, maybe extract into a design guidance structure though succinct 2/3 pages? The areas need to be linked to the visual/mapped areas too.	The finalised State of the AONB Report will contain much of this information.	No change
16. MCC	WV- L2	Suggest the following changes ; "WV- L2 Encourage and enhance appropriate landscape scale action by all, particularly on consolidating ecosystem services through the adoption of a green infrastructure approach. Green Infrastructure will provide a multi-functional approach for environmental and economic issues as well as addressing social, health and well-being and climate change matters."	This would unnecessarily place a definition into the Strategic Objective.	Insert new final sentence to 8.1.4 "Much of this can be achieved through the adoption of a green infrastructure approach. Green Infrastructure will provide a multi-functional approach for environmental and economic issues as well as addressing social, health and well-being and climate change matters." Insert in WV-L2 after 'landscape scale' "and green infrastructure"
16. MCC	WV – L6	Also add "Develop a better understanding of the likely impacts of climate change on the landscape of the Wye Valley AONB and support mitigating and adaptive actions".	This would be better added to WV-P8	Add to WV-P8 " , including developing a better understanding of the

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				likely impacts of climate change on the landscape of the Wye Valley AONB and supporting mitigation and adaption actions”
16. MCC	General	I know it's a time issue but to get the document more widely used in a planning context I wonder is there anyway of producing a summary of key points and making it more visual and with more graphics, more user friendly ?	Noted. It will depend on time & resources once the Plan has been adopted.	No change
16. MCC	Foreword	The need for a “Welsh” intro as well as the Defra one	Acknowledged. WG is working on one.	Insert WG Ministerial Foreword when available
16. MCC	Declaration	Change our cabinet member title to Environment, Public Services & Housing (although likely to change again before publication)	Noted	Amend
16. MCC	6.4.3 / 4	There are a couple of places where the text could possibly be simplified: 6.4.3 / 4 seems to be rather detailed, perhaps some of the qualification could be in an appendix?	Noted, but the clarification on methodology is not sufficiently long to warrant a separate appendix.	No change
16. MCC	7.3.1/2/3	Whilst I can understand the need for 7.3.1/2/3 it does read as a rather convoluted explanation (having said that I can't immediately suggest a rewording!)	Noted	No change
16. MCC	7.1.2	Theme 1 refers to cultural heritage in the first opening paragraph but it's not referred to in the following “components”;	Accepted	Amend 4 th bullet to read “to conserve the cultural heritage and historic environment and promote sympathetic management” and amend the Aim in 8.4 accordingly.
16. MCC	9.4.3	We are not sure you can describe the rural bus service in the AONB as being extensive. Moreover, local authorities are looking at the level of funding for all bus services not just those in rural areas, and looking at different methods of operation to maintain some semblance of a service;	Accepted	Delete ‘extensive’
16. MCC	9.4.5	On the comment about planning complications, we think that needs tidying up to say that the Monmouth to Redbrook route has planning approval and just awaits funding to be identified to allow it to be delivered. The route from Tintern to Tidenham / Chepstow hasn't yet secured planning approval, and similarly not got any funding to	Noted	Insert “and/or funding” between ‘planning complications’

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		implement.		
16. MCC	9.4.6	“the good condition” statement is potentially confusing, are you saying they are or should be?	Accepted	Modify 2 nd sentence to read “When in good condition, the roadside....”
16. MCC	9.4.7	There is no longer a statutory requirement for Welsh LAs, such as us, to produce local transport plan, and regional transport plans may well be subjugated to a new National Transport Plan. We wonder if there's some merit in the risks and opportunities provided by the emerging Cardiff Capital region metro concept which puts a greater focus on economic issues, and outcomes of job creation. Concentrating on certain corridors may move the focus and funding away from areas such as the AONB with its greater tourist role. To that end, might want to reference the Sustainable Transport within Tourism study of 2012 jointly commissioned by Sewta and Capital Region Tourism which proposed a series of recommendations to take forward the role that transport plays in tourism in the region.	Noted	Insert new 2 nd sentence “In Wales the National Transport Plan is supported by the local authorities and delivery partnerships such as the Cardiff Capital Region Board.” Insert new 2 nd sentence to 11.1.7 “The ‘Sustainable Transport within Tourism’ Study for the South East Wales Region (2012) also provides a number of recommendations and actions to make tourism more sustainable.”
16. MCC	9.4.8	This might the place to refer to the Active Travel Act and it requiring “Welsh local authorities...to take reasonable steps to enhance the provision made for walkers and cyclists....and to exercise their functions so as to promote active travel journeys and secure new and improved active travel routes and related facilities. For a [new] route to be regarded as an active travel route, Monmouthshire County Council must take into account whether the route facilitates the making by walkers and cyclists of active travel journeys. An active travel journey being a journey made to or from a workplace or educational establishment, or in order to access health, leisure or other services.”	Verbatim referencing of Act not necessary, but acknowledge need to mention ‘active travel’	Amend 9.4.7 to read “...modal hierarchy, which balances the priorities of active travel, walking and cycling, with public transport and...”
16. MCC	11.1.4	The fact that a large proportion of the bedspaces in the AONB are in the self-catering sector, (with a large proportion of these provided by caravan and camping), means that the area is particularly dependent on good weather and its economy especially vulnerable when the weather is bad as it was in 2012.	Accepted, although this is reference in 11.1.3.	Insert 11.1.4 at end of 2 nd sentence “(but consequently vulnerable to poor weather)” and at end “and somewhat weather dependant.”
16. MCC	11.1.5	This seems to underplay the existing visitor infrastructure and historic / industrial	Noted. However the	Move last sentence to

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		heritage and its importance to the story of the Wye Valley and to its visitor experience.	landscape is the key attraction recorded in visitor surveys.	beginning and insert new 2 nd sentence "However the rich cultural and industrial heritage and the valley's long history as a visitor destination are also notable factors."
16. MCC	11.1.7	We think there should be an explicit reference to Destination Development Plans. We are not sure what stage FoDDC and Herefordshire are at with their plans, and presumably it's important that the AONB sustainable tourism strategy links with all three plans. What about...11.1.7 "The AONB Partnership adopted a Wye Valley AONB Sustainable Tourism Strategy in 2011 (having previously implemented one from 1996). This Strategy contains an analysis of the tourism industry and an action plan to develop the area as a sustainable tourism destination. The AONB Unit services a Tourism Co-ordination Group to deliver the Strategy. Members of the Tourism Co-ordination Group include HCC, FoDDC, and MCC. It is critical that approved destination management plans, for the areas these authorities are responsibility for, demonstrate links to the AONB's strategy, and help deliver the following six functional objectives which provide the framework for the action plan:..."	Acknowledged	Insert at end of 11.1.7 "It is important that approved destination management plans for the area demonstrate links to this Strategy. For Public Bodies this will help fulfil their CRoW Act Section 85 'Duty of Regard.'"
16. MCC	11.2.2	We think the recreation wording overplays "conflict" and in 11.2.4 whilst it refers to the health benefits of countryside access it underplays the economic benefits and could usefully refer to the importance of countryside access for tourism (perhaps cross reference to Monmouthshire Destination Development Plan and the Walking Product Development Strategy?)	Noted. 11.2.1 references the importance of access for tourism	Insert in 11.2.1 new 7 th sentence (after '...consciously or subconsciously.') "This is a primary element of the visitor experience." Insert in 11.2.2 new 1 st sentence to read "The health and economic benefits of access and recreation are important. But there are conflicts..."
16. MCC	WV-R4	Not at all sure about the wording: Least restrictive access (or minimum barrier) is generally the terminology for the "contextual" response to improving access and addressing DDA compliance (as opposed to "access for all"); this is our definition (from our A to Z document): "The County Council operates a "minimum barrier" policy, with respect to new Public Rights of Way. Wherever maintenance issues arise	Accepted.	Amend

Organisation / Name	Paragraph / Policy	Respondent's change or addition	Response	Recommendation
		to replace, repair or install new items of furniture on Public Rights of Way the opportunity will be taken to place the least restrictive barrier possible on site. Each case will be individually assessed by the Rights of Way Field Warden and any necessary furniture installed taking into account: the paths status, current historical furniture on site, topography, nature of farming and land use and what would be the least restrictive access in that particular location, the landowners wishes.” Although we don't explicitly mention natural beauty that would be part of the contextual response – it might therefore be better to say .. and promote access improvements or even access for all, where this ... ?		
16. MCC		There is much reference in the Management Plan in relation to Ecosystem Services in general however, it is worth noting that in the Pollinator Action Plan (Wales) it says AONB management plan should recognise the importance of pollinators specifically. The extract from the action plan is as follows; Area for Action 2.2: Promoting, creating and enhancing diverse and connected flowering habitats across protected areas and the wider countryside <ul style="list-style-type: none"> • Work with NRW to ensure action for pollinators on designated sites, and within the woodland estate. • Ensure National Park and AONB outcomes and indicators include biodiversity and pollinators. • Review key regulations and designations which impact on pollinators to ensure they are fit for purpose. 	There are 12 references to 'Pollination' in the Management Plan	Insert at end of 8.2.6 “This includes a Pollinator Action Plan, promoting, creating and enhancing diverse and connected flowering habitats across protected areas and the wider countryside.”
16. MCC	6.4.7	Priority Habitats should include reference to the Wales Section 42 list of priority habitats in Wales.	Noted	Add to end of 3 rd sentence”... , although there is a NERC Section 42 list of Priority Habitats in Wales.”
16. MCC	Table 8	Under Biodiversity (Page 36) Reference to the Ecosystem Goods and Services should include pollination.	Accepted	Amend
16. MCC	Table 9 Horse riding	(Page 46) the effects of horse riding should include grazing pressures on local wildlife site quality grasslands.	Accepted	Add to Negative Impact column “Over grazing can degrade species rich grassland”
16. MCC	Table 9 Agriculture	(page 48) Land Management, agriculture could include conversion of buildings used by protected species (bats and barn owls).	Accepted	Add to penultimate bullet in Negative Impact column “&/or impact on protected species

Organisation / Name	Paragraph / Policy	Respondent's change or addition	Response	Recommendation
				roosts/nests (eg. bats and barn owls)"
16. MCC	Table 9 Energy	(page 50) There are negative sides to renewables for biodiversity (bats and birds with turbines, habitat loss with PV etc.).	Accepted	Add to Negative Impact column "&/or may impact on biodiversity ((bats and birds with turbines, habitat loss with PV etc.)"
16. MCC	8.5	Under Farming Section a specific reference to pollinators in section 8.5.3 would be valuable	Noted. However reference more appropriate in 8.5.4	Amend 8.5.4 2 nd sentence to read "...range of ecosystem services including healthy food, pollination,..."
16. MCC	8.5.6	the recognition of small landowners as managers of important wildlife sites is welcomed.	Acknowledged	No change
16. MCC	9.1	Under Theme 2 Development and Transport; reference to SPG (in wales) is relevant.	Acknowledged	No change
16. MCC	8.2	Generally the Biodiversity Strategic Objectives look good.	Acknowledged	No change
17. MMG	Table 8 SQ4	We would like to see Table 8 SQ4 amended to include 'Species Diversity' and 'Wild Species Diversity'	Accepted	Amend
17. MMG	Table 8	Ideally we would like to see the description of this quality changed to 'species-rich grassland' as describing it solely as a landscape feature, stressing the field pattern with dry stone walls, appears to reduce the importance of these areas for biodiversity as well as their landscape value. This should also encompass species-rich grassland in other areas such as community fields, churchyards and private gardens.	Accepted	Add at beginning "Species-rich grassland, including..."
17. MMG	Table 9	We would also ask you to consider amending Table 9 to indicate the importance of retaining species-rich grassland wherever possible when developments are proposed or undertaken. By extending SQ4 to include all species-rich grassland, this Special Quality could be added to many of the Activities, such as housing and the built environment, which are putting pressure on the AONB.	Accepted	Add SQ4 to Field Sports, Horse riding, Sight-seeing, Walking, Tourism, Energy, including renewables, Mineral development, Housing & the built environment, Transport & Traffic, Local housing, Water pollution,
17. MMG	9.1.8	Opportunities to include the importance of conserving and enhancing species-rich grassland have been missed, for example in 9.1.8 on the impact of some inappropriate Permitted Developments where 'improvement' of grassland resulting in a loss of species could be mentioned.	Accepted	Insert in 3 rd sentence after '...such as' "improvement of species-rich grassland,"

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17. MMG	12.2.6	We would like the Residents' Charter to stress the need for active management of wildlife sites, by reinforcing paragraph 12.2.6 to read: Manage your land for wildlife and maintain the rural nature of your property Fields, woodland, paddocks and gardens support valuable and threatened wildlife and should be actively managed to enhance their wildlife value. Inappropriate materials and features, often associated with urban areas, are leading to the gradual loss of the AONB's valued rural feel.	Accepted, although management needs to be sensitive rather than just active.	Add to 1 st sentence "and need sensitive management to enhance their wildlife value"
17. MMG	General	We support the positive statements in the Draft Management Plan regarding protection of the natural environment and biodiversity, and in particular policy objectives WV-L1, WV-L2, WV-B1, WV-B2, WV-B3, WV-B4, WV-B5, WV-B6, WV-F1, WV-F2, WV-F3, WV-F4, WV-T3 (managing verges for biodiversity).	Acknowledged	No change
17. MMG	WV-L1	We feel this Strategic Objective could be strengthened by explicitly identifying biodiversity as an important part of the overall aim and suggest amending these with the addition of the word 'biodiversity':	Biodiversity is a constituent of natural beauty, as explained in 1.2.1	No change
17. MMG	WV-F1	We feel this Strategic Objective could be strengthened by explicitly identifying biodiversity as an important part of the overall aim and suggest amending these with the addition of the word 'biodiversity':	Biodiversity is a constituent of natural beauty, as explained in 1.2.1	No change
17. MMG	WV-F3	We feel this Strategic Objective could be strengthened by explicitly identifying biodiversity as an important part of the overall aim and suggest amending these with the addition of the word 'biodiversity':	Biodiversity is a constituent of natural beauty, as explained in 1.2.1	No change
17. MMG	8.2	We feel that the detailed policy objectives relating to woodland could also be applied to grassland as an equally important, if less dominant, feature, and under more severe threat. We strongly encourage the addition of a policy objective to: "Encourage management of existing species-rich grassland and encourage the restoration of other grasslands or creation of new areas of species-rich grassland and their subsequent sympathetic management, whether in fields, in churchyards, along road verges or other public areas."	Noted, however WV-B3 encompasses such potentiality. However accept that the contextual paragraphs could be strengthened.	Insert at end of 8.2.1 "Species-rich grasslands are an important visual element in the AONB as part of the landscape of small fields, in churchyards, along road verges or other public areas, but they also play a vitally important part in providing the biodiversity of the area, protecting endangered plant species, providing habitat for bees

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				and other pollinators and occupying a vital place in the ecosystem of the area.”
17. MMG	WV-D2	We are concerned that insufficient attention is given to the inadvertent destruction of meadows and other areas of environmental importance and suggest amending WV-D2 with the addition ‘and minimise the impact on the natural environment’	Accepted	Amend
17. MMG	WV-D3	We are concerned that insufficient attention is given to the inadvertent destruction of meadows and other areas of environmental importance and suggest amending WV-D3 with the addition ‘or other sites designated as environmentally important’	Accepted	Amend
18. NE	General	Overall, Natural England is very satisfied with the management plan. The strategic objectives are very robust, again keeping conservation and enhancement of the area's natural beauty as the primary aim.	Acknowledged	No change
18. NE	General	We were really encouraged to see that the area's ecosystem services had been identified and the adoption of an integrated landscape scale approach, to create more resilient networks and habitats, that improve the adaptive capacity of the countryside and the maintenance of ecosystem services is promoted within the plan.	Acknowledged	No change
18. NE	General	We were also pleased to note that thought had been given to the surrounding landscapes, towns and countryside and the connectivity and connections both into and out of the AONB whilst keeping the primary purposes of AONB designation at the heart of the strategy.	Acknowledged	No change
18. NE	1.1.2	Suggest the sentence is reworded to include opportunities, ‘This provides a number of challenges and opportunities for the management of the Wye Valley AONB.	Accepted	Amend
18. NE	1.1.5	We were not aware that Natural England had ‘A duty of care’ for the AONB and we would question which Act this duty comes from. We are more familiar with the ‘Duty of Regard’ that we have under Section 85 of the CROW Act.	NE has a number of statutory powers and duties in relation to protected landscapes. These encompass designation and boundary variations, and monitoring and advising Ministers on their management and governance, as well as the s85 duty. NE also furthers the management and support of protected	Rephrase last sentence to read “The government departments and agencies, responsible for designating AONBs and advising Government and others on how AONBs should be protected and managed are Defra, Natural England and Natural Resources Wales.”

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			landscapes through its advocacy, incentives, advisory and delivery activities.	
18. NE	5.3.1	Delete the word all – not all AONBs are members of the NAAONB.	Accepted	Amend
18. NE	8.2.1	The correct title is the Severn Estuary SAC, SPA and Ramsar, not River Severn	Accepted	Amend
18. NE	8.2.7	The riverine habitat, migratory fish and Otter are also of European importance as shown by the SAC designation. This section could contain a bit more detail about the SAC woodlands and the quality of the river. Also the need for a good quality connected landscape to support the SAC bat populations could be emphasised more.	Noted	Insert new 2 nd sentence “The quality of the river and riverine habitat, with migratory fish and otters, are of European importance. Similarly the near continuous woodlands interspersed with species rich grassland make a high quality connected landscape.”
18. NE	8.6.6	Please add Natural England to the list of those that have woodlands open to the public. Natural England owns some woodland in the Wye Valley AONB (Hudnalls and Highbury). These are managed as NNR's. We also believe that Gloucestershire Wildlife Trust and Herefordshire Nature Trust have woodlands open to the public too.	Accepted	Insert new 5 th sentence “Similarly most (but not all) Nature Reserves have public access, these are managed by Natural England, Natural Resources Wales, Gloucestershire Wildlife Trust and Herefordshire Nature Trust.”
18. NE	11.2.2	Overuse is also a problem to the nature conservation value of the river and its European wide designated species and habitat. Over use of banks by canoeist and fishermen causes erosion cutting steps creating slides. The heavy use of the waterway does put both the habitat and species at risk of unfavourable condition status. Erosion of bank side footpaths means that paths have to be moved onto private land when the river erodes the path away which has happened in lower sections of the AONB.	Noted	Insert “and sections of riverbank” between ‘...popularity of some paths and trails ^ where users can...’ Insert new 3 rd sentence “Overuse is also a problem to the nature conservation value of the area, particularly where

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				European designated species and habitats are.”
18. NE	11.2.4	Agri-environmental schemes fund educational access but they are unlikely to fund any facilities. There are new schemes coming in so unsure of future commitment.	Accepted	Delete “funded”
19. Neil Cockburn	3.2.9	The plan refers to the importance of quality of life and how it is being diminished locally by the lack of services, the disconnect between people living locally and agriculture, and the oddly quiet rural landscape left behind as many who live in the AONB do not work locally are not here during the day. However, it is evident that the AONB unit and JAC strongly oppose many ventures that bring life and vibrancy to the AONB and a sea change in the attitude of the AONB management as shown in this document is a primary requirement before the quality of life can improve in the AONB. It is vital that enterprises are not strangled by over-zealous red tape which prevents them adding to life locally. I speak from experience on this matter, as the AONB unit has done everything in its power to oppose our use of polythene tunnels even though great economic and employment benefits are brought to the area through our business. The use of agricultural polythene covers are a fact of life in several areas of the AONB and it would be far better if the AONB unit tried to work productively and proactively with them rather than to continue blindly in opposition.	No evidence “that the AONB unit and JAC strongly oppose many ventures that bring life and vibrancy to the AONB”. Specific issues including landscape impact of polytunnels have been addressed through the planning system.	No change
19. Neil Cockburn	Table 3	Landscape Types in the AONB. These are designated by 1Km grid square intersections which is highly inaccurate and cannot give a clear picture of landscape types.	6.4.3 - 6.4.5 clearly explain the use and limitations with this methodology in the absence of other data.	No change
19. Neil Cockburn	Table 7	This states that English AONB land use is 46% crops and 41% grass. This is simply not a credible statistic, the arable percentage is much higher, and the grass area is much smaller than that stated.	6.4.8 explains that this is from the DEFRA Agricultural Census	No change
19. Neil Cockburn	Table 9	In the category Visual Pollution complains that extensive areas of plastic can degrade landscape. This type of emotive language has no place in a professional plan and should be removed. It must be remembered that the use of polythene where it occurs is essential and contributes greatly to the quality of life of many people living and working in the AONB.	Recent Planning Inspector's decision determined that there are places in the AONB where polytunnels should not be placed because they would “be particularly harmful to the landscape	No change

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			quality of the AONB".	
19. Neil Cockburn	7.1.2	Strategy Theme 1: Our unique Landscape. Although not a major point, the land in question is actually owned by individuals, not the nation. As far as I am aware, land has not yet been nationalised.	5.4.1 states that "Most of the Wye Valley AONB is in private ownership." However landscape is a national asset.	No change
19. Neil Cockburn	7.3.3	Interpretation of Strategic Objectives in practical terms means that broadly conservation and enhancement of natural beauty overrides all else. This is in conflict with the need in 3.2.9 to try to improve the lives of people living in the AONB. If enterprises that can bring economic benefits to the area are strangled then it will indeed become a museum and those living here will become further isolated. It is vital that the AONB is allowed to thrive and prosper, and this will be most likely led by innovative agriculture and associated enterprises which may indeed include the use of polythene. This should be supported and attempts to choke such enterprises are reprehensible.	The Management Plan is essentially about conserving and enhancing the natural beauty of the AONB; the statutory purpose of the national designation.	No change
19. Neil Cockburn	8.5.3	This paragraph states that farm scale polytunnels are not acceptable and that natural and scenic beauty must take precedence. This is exactly the sort of policy that will kill off the AONB and see it become a dull museum with no life. It is the duty of the AONB to try to work with agriculture to produce a result satisfactory to all concerned and this should receive a much greater emphasis than is shown at present. The antagonism towards polythene tunnels should be removed	This paragraph is consistent with NPPF para 14, 115 & 116.	Change "normally" to 'necessarily'
19. Neil Cockburn	8.5.4	It is plainly obvious that the beauty of the AONB is man-made, principally by agriculture. This has to evolve according to the pressures and demands around it, and the following paragraph, 8.5.4, goes some way to addressing this issue. However, at the end of the section it states that "agricultural activity that significantly diminishes or destroys the natural beauty etc should not be supported. This attack on practises deemed not to accord with AONB ideals is wholly inappropriate and should not be included in this document.	Para 1.3.2 states what the purpose of the AONB Management Plan is. It is wholly consistent with the purpose of the Management Plan to not support activities that diminish or destroy ecosystem services or the reason why the area is nationally designated.	No change
19. Neil	WV-F3	This can be seen as a direct attack on anything agricultural which the AONB disagrees	The AONB is a	No change

Organisation / Name	Paragraph / Policy	Respondent's change or addition	Response	Recommendation
Cockburn		with and is extremely contentious. It should be removed from this document.	national designation (and inanimate). The AONB Partnership is a consensual partnership which seeks to conserve and enhance the natural beauty of the AONB. This Strategic Objective is consistent with that endeavour.	
19. Neil Cockburn	WV-F7	This purports to encourage local producers but this is of little aid when it is opposed and overridden by WV-F3	Correct. If the local production destroys the character of the AONB then it should not be encouraged.	No change
19. Neil Cockburn	9.1.5	This gives a very negative tone and treats polytunnel applications as being damaging and dominant. This is contentious and should be removed.	The context here is of size / scale. Polytunnel applications have tended to be the largest applications in the AONB.	No change
19. Neil Cockburn	9.1.8	The implication that permitted development rights should be removed is unwarranted and needs to be taken out. As for infringements and retrospective applications, these often occur as a result of the planning goalposts being moved and demanding ever more intrusive enforcement and monitoring of LPA behaviour in these difficult economic times is unnecessary and wasteful.	There is no implication that permitted development rights should be removed. Monitoring "moving goalposts" is essential (to avoid hitting posts rather than goals)	No change
19. Neil Cockburn	9.1.9	Once again, even though there are clear economic benefits to the area from the use of agricultural polythene whether within planning controls or not, it is referred to as an erosive effect. This is clearly hostile to agriculture and needs to be removed from the draft if it is to be a credible document.	The visual impact is referenced here, the economic benefits of agriculture are noted	No change

Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2014-2019
 Response to Consultation Draft comments (closed 31st January 2014)

Organisation / Name	Paragraph / Policy	Respondent's change or addition	Response	Recommendation
			in Table 9 and para 10.2.3.	
19. Neil Cockburn	12.2.10	The residents and visitors charter complains that high levels of water are being abstracted. Agriculture has made great strides in reducing it's water use whilst improving crop yields and quality through measures such as trickle irrigation and efficient irrigation scheduling. The greatest amount of water is removed for homes and domestic consumption and the environment agency should be kept to its obligations to maintain river levels by releasing water from the Elan valley Dams when necessary.	Acknowledged	No change
20. NRW	General	NRW welcomes the comprehensive, integrated and thorough draft Plan, which is a revision of the existing five year Plan.	Acknowledged	No change
20. NRW	General	We note that there are a number of documents allied to the Plan which will also require revision. Key to supporting the Management Plan is the State of the AONB report which sets out the main characteristics (resources) of the AONB upon which the Special Qualities are based and the forces for change acting on them. Vitrally the report identifies the trends, improving or declining in the Special Qualities. Without this evidence to underpin decision making it could be difficult to revise the Management Plan in a transparent way. Therefore, NRW recommends that the revised State of the AONB report be made available as soon as possible to ensure robust revisions are made and for stakeholder information too.	Acknowledged	No change
20. NRW	General	The current Plan already has an SEA and HRA. You will be aware these assessment processes are iterative. We would therefore advise that the existing SEA and HRA are revised if, following consultation, the new Management Plan is significantly changed from the last.	Acknowledged	No change
20. NRW	General	NRW is recommending the adoption of an Ecosystems Approach as you acknowledge in section 4.2. This Approach advocates enhanced information on the societal value of the AONB for stakeholders, wider engagement, generation of management options and consensus building. Although mentioned in the Plan it could be beneficial to apply the Approach more fully through the consultation process.	Acknowledged	No change
20. NRW	General	Maps are a very useful visual tool and the two attractive maps in the draft Plan could be perhaps better deployed at the beginning rather than the end of the document.	Accepted	Insert AONB boundary map inside front cover and LMZ map at rear.
20. NRW	General	Also to aid clarity and understanding we would recommend that early in the draft (perhaps in 1.3) the Management Plan and its allied documents are clearly set out, along with the relationship to LDP's etc. The allied documents include the SoAONB report, the Action Plan, the SEA / HRA assessment and could refer to any guidance notes Wye Valley have produced e.g. on small scale renewables.		Insert new para 1.3.4 'Therefore this Management Plan sits in the following context:- National: National Parks and Access to the

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				Countryside Act 1949, Countryside and Rights of Way (CROW) Act 2000, Planning Policy Wales, National Planning Policy Framework. County/District: Forest of Dean Core Strategy, Gloucestershire Minerals Local Plan, Herefordshire Local Plan & Core Strategy, Monmouthshire Local Development Plan. Local: State of the AONB Report, AONB Management Plan Action Plan, Habitats Regulation Assessment & Strategic Environmental Assessment, various Wye Valley AONB Partnership guidance notes and positions statements. The SEA & HRA contain a full list of policy documents relevant to the Wye Valley AONB.
20. NRW	General	The Special Qualities of the AONB are very important and should be highly visible in the Plan. We suggest that their position in the Plan be promoted and be made more prominent and their location moved to earlier in the document as opposed to being located in table 8.	Accepted	List Special Qualities in 2.1.9
20. NRW	General	It is noted that the new draft no longer includes an appendix containing a glossary. NRW recommends including such an appendix. In addition, a list of key 'supporting documents' and references could usefully be included with links to selected useful websites.	Noted. The SEA & HRA contain a full list of policy documents relevant to the Wye Valley AONB	Insert Glossary as Appendix III

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20. NRW	General	Another useful section as a quick reference for stakeholders would be 'What has changed in this Plan since the last one?' This in our view would aid and promote understanding and transparency.	This will be reported to the JAC and previous versions of the Management Plan are available on the AONB website.	Make accompanying report available on line.
20. NRW	General	The Strategic Objectives should ideally be SMART as recommended in the existing 'CCW Guidance on the Review of AONB Management Plans' 2009. Whilst our view is that as currently written the objectives are not SMART, it is essential that the actions within the Action Plan are SMART as these effectively support and underpin the Objectives. Action Plan – Is it intended that the action plan be made available alongside the management plan as the action plan has an important relationship with the strategic objectives? (Refer to comments under point 11 above). We consider that the action plan is the opportunity to be sufficiently SMART to deliver the strategic objectives.	Acknowledged	See Action Plan
20. NRW	General	We recommend that reference is made to the Welsh Government draft document 'Taking the Long View' that sets the direction for Welsh Protected Landscapes. It is particularly relevant to the Community Development aspects of the draft Plan.	This has now been superseded by the Review of Designated Landscapes	No change
20. NRW	General	Whilst recognising the work on the ground to provide bilingual information and guided walks it would be helpful to include a reference in the Plan to supporting local / cultural distinctiveness including the Welsh language in the Plan. This would recognise the strong growth in the Welsh language taught at schools especially in South Wales.	Acknowledged.	Insert after 1 st sentence in 10.1.5 'This may include supporting local / cultural distinctiveness and the Welsh language or local accents and dialects.'
20. NRW	General	Welsh Government's Glastir agri-environment scheme is an important tool in seeking to enhance the environmental goods and services provided by agricultural holdings throughout Wales and should be referenced in the Plan (see specific comment below). It is worth noting also that a review of the scheme is coming up and the new Rural Development Plan under which it is funded will be out to consultation in the near future.	Noted	No change
20. NRW	General	We feel that reference needs to be made to the importance of all adopting biosecurity measures to help prevent the spread of both pests and diseases as well as invasive plant species. We recognise that this is mentioned in the charter for residents and visitors under section 12.2 but not elsewhere and there would be benefit of doing so..	8.5.2 refers to Biosecurity, also WV-B4, WV-F6 & WV-W4 refers to control of pests &	No change

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			diseases.	
20. NRW	General	In the same vein it may be useful to note that Forest Design Plans are becoming Forest Resource Plans but the transition is at an early stage.	Noted	No change
20. NRW	General	Many AONB's have received EUROPARC's Sustainable Tourism Charter. Would this add potentially any value to the Wye Valley's excellent tourist destination planning? If so it would probably be worth referencing.	The AONB Tourism Co-ordination Group decided not to pay for the Charter, but to pursue its objectives.	No change
20. NRW	General	A small point of accuracy is that the Plan needs to be re-checked for incorrect references to Forestry Commission and Environment Agency in Wales, as well as Welsh Assembly Government (now Welsh Government).	Noted, bearing in mind that the Forestry Commission & Environment Agency still exist on the English part of the AONB.	Amend
20. NRW	1.1.2	It would be worth recognising the fact that, in addition to being a challenge, the cross-border nature of the AONB does also present a strength in the range and experience that the various partners are able to bring to the management of this internationally important landscape designation.	Accepted, however more appropriate to include in 5.4.2	Insert to end of 5.4.2 "However, the cross-border nature of the AONB does also present a strength in the range and experience that the various partners are able to bring to the management of this internationally important landscape designation."
20. NRW	1.3	In our view this section should be moved up to the start of the introduction.	Accepted	Amend and re-number Section 1.
20. NRW	Section 1	Under this section we would also advise that a summary is included to give the reader a feel for the main changes between this version and the previous plan (Refer to comments under point 10 above).	This will be reported to the JAC and previous versions of the Management Plan are available on the AONB website.	Make accompanying report available on line.
20. NRW	3.2.5	There should be more emphasis here on the fact that the threat from pests and diseases is high as opposed to just having potential to affect woodland within the Wye Valley. In particular, Phytophthora ramorum is significantly affecting larch plantations across Wales and will have implications for the clear felling of larch trees in the Wye Valley.	Acknowledged	Delete 'potentially'. Insert at end "In particular, Phytophthora ramorum is significantly affecting

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		<p>This will have a consequent effect on the landscape (through clear felling larch sites under tree health notices). It is worth noting that the effect of Phytophthora ramorum can also be viewed as positive in that it will help to achieve restoration of Planted Ancient Woodlands (PAWS) areas back to broadleaves quicker (although not through the preferred method of continual thinning). The areas not designated as PAWS are likely to support mixed conifers /broadleaves so as not to have a monoculture of trees and this will benefit tree health and wider conservation including protected species.</p>		<p>larch plantations and will have implications for the clear felling of larch trees in the Wye Valley. It is worth noting that the effect of Phytophthora ramorum can also be viewed as positive in that it will help to achieve restoration of Planted Ancient Woodlands (PAWS) areas back to broadleaves quicker (although not through the preferred method of continual thinning). The areas not designated as PAWS are likely to support mixed conifers /broadleaves so as not to have a monoculture of trees and this will benefit tree health and wider conservation including protected species.”</p>
20. NRW	3.3.3	<p>With reference to salmon stocks in the River Wye we consider that there would be merit in stating that significant habitat improvements to spawning grounds have been undertaken to help reverse the decline in stocks and that it is hoped that this will benefit the River's future salmon population.</p>	<p>Noted. However the improvements to spawning grounds are upstream of the AONB.</p>	<p>No change.</p>
20. NRW	4.1.3	<p>Natural Resource Management is referred to and the thinking is at an early stage although confirmed as being developed at a catchment scale. With this in mind it may be helpful to include some reference to sharing management experience beyond the AONB boundary into the surrounding catchment if staff resources allow.</p>	<p>Accepted</p>	<p>Insert at end: ‘In both England and Wales natural resource management is moving towards the scale of river catchment management’. Also add to end of 4.2.2</p>

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				'River catchments are becoming recognised as an appropriate scale for this, including the Wye catchment.' Also add to end of 4.4.5 'Sharing management experience beyond the AONB boundary, into the surrounding catchment and/or beyond, is also encouraged where resources allow.'
20. NRW	5.4.8	We note that reference to the water Framework Directive in the Plan. However we feel that this needs further explanation and acknowledgement. This Directive is the most substantial piece of water legislation from the EC to date. It requires all inland and coastal water bodies to reach at least "good status" by 2015. It will do this by establishing a river basin district structure within which demanding environmental objectives will be set, including ecological targets for surface waters. The Directive therefore sets a framework which should provide substantial benefits for the long term sustainable management of water. The aim of the Directive is to safeguard and improve water quality. It will do this through River Basin Management Plans which will develop the links between surface and groundwater, and water quantity and water quality. The Environment Agency and Natural Resources Wales are the lead agencies for ensuring that that the Directive is implemented. AONB management plans should recognise the importance of the water environment and articulate the steps that will be taken within the AONB to meet Water Framework Directive objectives, encouraging appropriate partnerships and action in priority catchments.	Accepted	Insert new penultimate sentence "The aim of the Directive is to safeguard and improve water quality. It will do this through the RBMPs which develop the links between surface and groundwater, and water quantity and water quality. The Environment Agency and Natural Resources Wales are the lead agencies for ensuring that that the Directive is implemented." Insert at end "The Wye Catchment Partnership was established in 2014 with support from Defra and the Welsh Government to bring the farmers, foresters, planners, charities, statutory bodies and

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				people who have an interest in the Wye together to secure better outcomes for the Wye catchment and the environment we rely on. The partnership is hosted by the Wye and Usk Foundation.”
20. NRW	8.2.2	It is noted that reference is made to poor ecological status due to diffuse pollution under Section 8.2.2 of the Plan. However, we feel that further consideration should be given to the inclusion of what partnerships and actions are planned to tackle diffuse pollution (also refer to comments in respect of Table 8 below).	Accepted	Insert new 5 th sentence: “The Wye Catchment Partnership has a shared understanding of the principle problems and their causes and acts as a focal hub in delivering action to correct the identified issues, including delivery of the Wye Nutrient Management Plan.”
20. NRW	6.2.1	Landmap – For those readers of the Plan not familiar with Landmap we consider that there should be an explanation of the classification process probably included as part of a glossary to the plan. Also under this section we consider that there would be benefit in updating the Plan to refer to the emerging Local Development Plan for Monmouthshire (this is due to be adopted by the end of March 2014).	Accepted	Add Glossary as on-line appendix. Insert in 2 nd sentence “and methodology” after ‘leadership’. Insert after ‘...Unitary Development Plan’ “and Core Strategies and Local Development Plans”.
20. NRW	Table 8	We note the deletion of reference to air, soil and water quality, These are important parameters for a healthy functioning landscape and underpin the Ecosystems Approach. Therefore we strongly urge that consideration needs to be given how the Plan will address these elements within the objectives of the Plan.	Acknowledged. Water quality is a constituent part of SQ3 The river & tributaries. Soil quality varies across the AONB and is	Insert new para 6.3.7: “Air, Soil and Water quality: In previous AONB Management Plans these were categorised as separate Special Qualities. However, water quality is

Organisation / Name	Paragraph / Policy	Respondent's change or addition	Response	Recommendation
			<p>determined by the underlying Geological Special Qualities, SQ 6, 7, 8, 9 and 10. Air quality is not a unique or defining feature of the Wye Valley and is dependent on weather and occasionally temperature inversions in the Wye Gorge.</p>	<p>a constituent part of SQ3 The river & tributaries. Soil quality varies across the AONB and is determined by the underlying Geological Special Qualities, SQ 6, 7, 8, 9 and 10. Air quality is not a unique or defining feature of the Wye Valley and is dependent on weather and occasionally temperature inversions in the Wye Gorge. The government provides guidelines and codes of good practice on the management and maintenance of air, soil and water quality. The following Ecosystem Goods & Services are also listed in Table 8 which helps identify what consideration need to be given and how the Plan addresses these elements.</p> <ul style="list-style-type: none"> • Air Quality <ul style="list-style-type: none"> • Regulating Services: Climate regulation, Air quality regulation, Pollution control, Pollination, Noise regulation, Local climate regulation. • Soil Quality • Provisioning Goods:

Organisation / Name	Paragraph / Policy	Respondent's change or addition	Response	Recommendation
				Food, Fibre, Fresh water, Biofuels, Timber <ul style="list-style-type: none"> • Regulating Services: Water quality regulation, Erosion control, Pollution control, Soil quality regulation, Water regulation, Flood regulation, Wild species diversity. • Water Quality <ul style="list-style-type: none"> • Provisioning Goods: Fresh water, Water • Regulating Services: Climate regulation, Water quality regulation, Pollution control, Disease and pest control, Water regulation, Flood regulation, Local climate regulation, Wild species diversity Consequently, while not specific Special Qualities, Air, Soil and Water quality are important parameters for a healthy functioning landscape and underpin the Ecosystems Approach.
20. NRW	Part 2 Introduction	Change required; should refer to 2014-2019 plan rather than 2009 – 2014.	Accepted. Due to slippage Plan period is now 2015-2020	Amend
20. NRW	7.1.6	Is the reference to “charter” appropriate? Would it be better to title this simply as, ‘What you can do to help support the AONB’?	Noted, but a formal title will help to reference it.	Insert at end of 7.1.6 “...that identifies what you can do to help support the AONB.”
20. NRW	8.1.4	In the last sentence, in addition to halting decline we would advise that actions should	Accepted	Insert after ‘halted’ “...and

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		help to reserve declines where appropriate.		declines reversed where appropriate.”
20. NRW	8.2.1	Replace “River Severn SAC” with Severn Estuary SAC”.	Accepted	Amend
20. NRW	8.5	Include reference to Glastir Agri-Environment Scheme in Wales – Entry Level, Advanced, Woodland Management and Creation Glastir Schemes.	Accepted, although full options do not need listing here.	Insert at end of 4 th sentence: “...(Countryside Stewardship in England and Glastir in Wales).”
20. NRW	8.6.2	Insert reference to larch as one of the tree species affected by Phytophthora ramorum.	Accepted	Insert “Larch” between ‘...Ash, Oak...’
20. NRW	8.6.7	We would advise that rather than saying “wherever possible woodlands need to be brought back into management”, it would be better to say woodland owners should be encouraged to undertake active and appropriate management of their sites including the use of coppice management.	Accepted	Replace ‘for example through coppicing’ with “woodland owners should be encouraged to undertake active and appropriate management of their sites including the use of coppice management”.
20. NRW	8.6.7.	Reference to “The right tree in the right place”, should be expanded to refer to the need to use the native species and give consideration to local provenance of those species.	Accepted	Insert at end of sentence “(including using native species and consideration of local provenance).”
20. NRW	12.2.6	There are probably 2 issues covered here which need to be separated. The maintenance of the rural nature of land although linked to wildlife conservation is important in its own right in terms of landscape character and should be included as a separate action in addition to managing land for wildlife.	Accepted	Add to 12.2.6 new 2 nd sentence “A few simple measures and sensitive management can enhance their wildlife value for everyone’s benefit.” Insert new 12.2.7 “Maintain the rural nature of your property: The use of traditional materials and skills, such as dry-stone-walling, helps retain the AONB’s valued rural feel, which is in danger of being gradually eroded

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				through the use of inappropriate and urban materials and features.” Re-number remainder accordingly.
21. DI	3.2.5	More mention should be made of the enormous impact that clear felling due to disease (e.g. Phytophthora) will have. When this happens the deer will be pushed into the remaining woodlands. There is then huge potential for damaging deer impact in these woods.	Accepted	Insert new sentence “Where this happens deer may also be pushed into the remaining woodlands, with consequent impacts of increased browsing”.
22. BCU	General	The plan is excellent, well balanced and covers the issues comprehensively and this includes your comments on Canoeing.	Acknowledged	No change
22. BCU	Table 9: Canoeing (& Climbing)	You make the point that Canoeing and Climbing could contribute to "Rogue Camping". Whilst I understand what you are trying to say. Can I point out that there is a big difference between "Rogue Camping" and "Wild Camping". "Rogue Camping" conjurers up the vision of "Unauthorised, noisy, messy, boozy camping, coupled with Anti-social behavior". Which of course should be deterred. "Wild Camping" on the other hand conjurers up a vision or responsible "Avid recreational camping by participants who leave no trace of their passing". Many "Wild Campers are highly experienced responsible people, who want to experience the outdoors with the minimum of cost and regulation who also want to be close to both their equipment and the natural phenomena they wish to experience. This form of Camping should be encouraged and small (very small) sites should be designated for 1 or 2 tents and maybe a maximum of 5 tents with those large enough should have the (discrete) provision of a composting loo.	Accepted	Insert in 11.2.2 new penultimate sentence: “For example providing for small scale low impact wild camping should not be confused with unauthorised, noisy or messy rogue camping.”
23. WVFDTA	General	We welcome the AONB Draft Management plan 2014-2019. We believe that that overall the objectives set out in the Management plan are an appropriate and sensible response to the issues noted in the document, in the light of the remit of your organisation. We particularly welcome the AONB's commitments to supporting and enhancing sustainable tourism in the Wye Vally. These commitments align well with the ambitions and objectives of the Tourism Association. We are happy to confirm that we look forward to continue to work with you to achieve the objectives you have set for yourselves.	Acknowledged	No change
24. EH	General	English Heritage welcomes and supports the prominence given throughout the draft	Acknowledged	No change

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		<p>plan to the area's historic environment and heritage assets. The historic environment makes a vital contribution to the special qualities of the AONB and underpins the character and distinctiveness of the area's landscapes and settlements as the draft plan clearly sets out in Tables 2 and 8. It also supports the benefits provided by the AONB for society, as for example in relation to tourism, recreation and amenity as well as the wider cultural aspects of sense of place, history, local character and distinctiveness. Moreover, the protection and enhancement of the historic environment is a fundamental dimension of sustainable development and pursuing it involves delivering positive improvements in the quality of the historic, natural and built environment.</p>		
24. EH	1.2.1	<p>English Heritage welcomes the clarification, using Natural England's definition, of what constitutes 'natural beauty' in paragraph 1.2.1, which recognises the way in which the interaction between natural and cultural influences has shaped the AONB's distinctiveness. This provides a rationale for integrated approaches to the management of the landscape which recognise, promote and enhance the cultural and natural qualities of the AONB.</p>	Acknowledged	No change
24. EH	2.1.4	<p>Paragraph 2.1.4 encapsulates well the key characteristics of the area's heritage assets. However, it could be strengthened by describing the area's distinctive settlement types and patterns, field systems, and vernacular building styles and materials. Details from the 'Key Characteristics' and 'Landscape Through Time' sections of the Wye Valley National Character Area profile could usefully be referenced here.</p>	Accepted	<p>Insert new 4th sentence "There is a range of distinctive settlement types and patterns, field systems, and vernacular building styles and materials." Insert new 2nd sentence to 8.4.3 "The Wye Valley National Character Area profile sections on 'Key Characteristics' and 'Landscape Through Time' provide further</p>

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				detail.”
24. EH	2.2.1	We would suggest rewording the statement about the historic environment as follows: <i>where the natural and historic assets are in good order, well-understood and accessible where appropriate, in fully compatible uses, and adapted and changed in ways which respect and enhance their significance not denigrated by unsuitable change</i>	Accepted	Amend
24. EH	3.2.1.1	The impacts of climate change mitigation and adaptation on the historic environment should be referenced, using some of the points made in Table 9 ‘Other’ on page 53.	Accepted	Move (eg. list to 3.2.1.1. “• Increased vulnerability of historic environment features e.g. wetter ground conditions on monuments causing greater poaching, increased decay of redundant farm buildings, erosion or damage of bank side archaeological features and structures such as bridges, watermills, wharves and forges.”
24. EH	3.2.1.4	Could paragraph 3.2.1.4 be expanded to read ‘Some measures to adapt to predicted changes might have unintended consequences for the landscape, historic environment and biodiversity...’?	Accepted	Amend
24. EH	3.2.2	Paragraph 3.2.2 makes an important point about the role for protected landscapes and their special qualities to support sustainable or ‘excellent’ growth. We note that the draft plan recognises the emerging importance of Local Enterprise Partnerships (LEPs) to help fund and support economic initiatives in the AONB (paragraph 5.4.9 nb, written as Local ‘Economic’ Partnerships). The draft plan may also consider the AONB’s engagement with Local Nature Partnerships, as environmental advisers to LEPs, and potential joint working over the plan period.	Accepted	5.4.9 replace ‘Economic’ with “Enterprise” Insert at end “The same applies to Local Nature Partnerships.”
24. EH	4.1.4	You may also wish to reference paragraph 7 of the National Planning Policy Framework (NPPF) here, which states that planning should contribute to conserving and enhancing the historic environment.	Noted, however many aspects are referenced in NPPF para 7 so it would be inappropriate to only highlight the historic environment.	No change

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24. EH	4.3.1.	The concept of ecosystem services doesn't always recognise, in the way that the NPPF does, that the historic environment is itself an environmental resource, whose sensitive adaptation and reuse is a core principle of sustainable development. In Table 1 'Provisioning Services', you may wish to add 'existing historic buildings and physical infrastructure' or similar to make the point that the historic environment confers physical as well as more intangible ecosystem services. This important point should be made here in order that later policies about the conserving and enhancing the special qualities of the AONB, including the reuse of existing buildings (as in WV – L1), are understood as ecosystem service benefits.	Noted, however Table 1 is taken from MEA 2005. Amending subsequent paragraph is more appropriate.	Insert in 4.3.2 new 3 rd sentence "The historic environment itself is also an environmental resource that confers physical as well as more intangible ecosystem services."
24. EH	5.4.6	Thank you for referencing the Joint Accord which EH has with the NAAONB, which guides our engagement at a strategic level	Acknowledged	No change
24. EH	Table 8 SQ 13 – 20	These relate to special qualities in the historic environment. Under the 'condition' column, it should be noted which if any assets identified under each heading are on English Heritage's Register of Heritage at Risk.	Accepted. However English Heritage's Register of Heritage at Risk isn't searchable by AONB or period.	Insert in SQ 14: condition: "but 4 sections of Dyke on English Heritage's Register of Heritage at Risk" Insert in SQ 15: condition: 6 churches on English Heritage's Register of Heritage at Risk
24. EH	7.1.2	Could the bullet point under paragraph (and the corresponding Aim in Section 8.4) read 'to conserve and sympathetically manage the historic environment of the AONB and to promote engagement with and understanding of it'? This is a more rounded objective which goes beyond simple conservation, and provides the rationale for strategic objective WV – H3.	Accepted	Amend
24. EH	WV – L3	We welcome WV – L3 which proposes the use of Historic Landscape Characterisation to inform future development and design.	Acknowledged	No change
24. EH	8.4	A paragraph on recent successes in the historic environment would be a great introduction to this section – Overlooking the Wye in particular.	It would be inconsistent to introduce a review of past achievements here. Overlooking the Wye is mentioned in 8.4.3	No change
24. EH	8.4.1	You may want to remove from the text and tabulate the numbers of designations in the AONB (if possible by county/country for those partners with specific geographic remits) for ease of reading. My understanding is that for the part of the AONB in	Data wherever possible is presented for the whole AONB.	Insert in 8.4.2 new 6 th sentence "Nearly 8% of heritage assets on the

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		<p>England, the totals as of August 2013 are as follows: 81 Scheduled Ancient Monuments 757 Listed Buildings, comprising: ☐☐20 grade I listed buildings - buildings of exceptional interest ☐☐40 grade II* listed buildings - important buildings of more than special interest ☐☐697 grade II listed buildings – of special interest warranting every effort to preserve them 2 sites on English Heritage's Register of Historic Parks and Gardens A figure for the number of items in the AONB on relevant Historic Environment Records would also be useful if available. A brief note on what designation means in terms of managing historic assets would perhaps be helpful here, or relevant weblinks (for English designations it is http://www.english-heritage.org.uk/caring/listing/).</p>	The State of the AONB report includes greater detail and breakdowns of data.	English side of the AONB are on the Register of Heritage at Risk."
24. EH	8.4.2	This paragraph should specify the datasets for measuring condition. In England, the tool for monitoring the condition of nationally important historic assets is English Heritage's Register of Heritage at Risk, and this should be referenced here. It would also be useful to record in this section that as at August 2012, there were 8 heritage assets on English Heritage's Register in the AONB: one grade II* listed building and 7 scheduled ancient monuments.	Accepted Greater detail and breakdowns of data are in The State of the AONB report.	Insert in 8.4.2 new 6th sentence "Nearly 8% of heritage assets on the English side of the AONB are on the Register of Heritage at Risk."
24. EH	WV – H1	This Objective may benefit from identifying a number of specific policies or schemes linked to key threats and opportunities affecting the AONB's historic environment as identified in the draft plan. This could include, for example, policies to protect traditional farm buildings (to respond to 'pressures', Table 9 page 49), approaches to secure agri-environment funding for landscape and historic environment features (ref para 8.5.4), or increasing numbers of Village Design Statements ('pressures', Table 9 page 51). As historic parks and gardens have already been identified as a component of the AONB's historic environment, do they need specifically referencing in this objective? If they are singled out here due to specific pressures or the need for specific interventions, this should be stated.	Accept that historic parks and gardens have already been identified. The elaboration and listing of specific schemes is more appropriate for inclusion in the Action Plan.	Delete "including Historic Parks and Gardens and designed landscapes," and insert at end of 8.4.1 "and designed landscapes." Add to Action Plan: <ul style="list-style-type: none"> • policies to protect traditional farm buildings • secure agri-environment funding for landscape and historic environment features • increasing numbers of Village Design Statements
24. EH	WV – H2	Objective is welcomed as a crucial step in understanding and agreeing future priorities	Acknowledged,	Add to Action Plan:

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		for local action. However, given some nationally important assets are already effectively priorities due to their inclusion on the English Heritage Register of Heritage at Risk, should there be a separate but related Objective to focus on these assets? Tackling Heritage at Risk is and will remain a priority for English Heritage and one on which we will continue to work with you.	however tackling Heritage at Risk is covered under WV-H1	“Working with English Heritage to tackle Heritage at Risk”
24. EH	WV – H3	Objective is welcome as a general principle, but are there specific activities, initiatives or opportunities which could be included here as priorities for the plan period? Otherwise this item may be hard to monitor and to demonstrate progress against.	Overlooking the Wye legacy work is included in the Action Plan.	Overlooking the Wye legacy work is included in the Action Plan.
24. EH	WV – F2	Could the historic environment be specifically referenced in Objective WV – F2 (uptake of agri-environment schemes), particularly if it cross-references to the wording for WV – H1 we have suggested?	Accepted	Insert “, historic environment” after ‘biodiversity’
24. EH	WV – W2	We welcome the careful wording of policy WV – W2 to recognise the need for forestry initiatives to respect the historic environment.	Acknowledged	No change
24. EH	WV – M3	We welcome Objective WV – M3 as a means of providing building stone for heritage conservation purposes.	Acknowledged	No change
25. NFU	General	Having read the draft plan with interest we think it would be worthwhile to have a further discussion about many of the elements in the plan. Therefore we would like to invite you to a meeting with NFU members in order to discuss the role of farming in the AONB and other issues that affect rural communities.	Awaiting invitation	No change
25. NFU	General	It would be appropriate by way of an introduction to offer a few general remarks on farming. Clearly food security is a key concern, on a global level it is of absolute importance that the world is able to feed itself; but it is equally important that food is produced in Herefordshire in order to meet our own needs.	Acknowledged in 8.5.1	No change
25. NFU	General	The challenge in the 21st century is to increase productivity, maximise output, minimise inputs, achieve environmental sustainability and adapt to a changing climate - all of these challenges are ones which British agriculture is very well placed to meet. It is therefore vital that the AONB Management Plan helps to ensure that farms can evolve and utilise best environmental practice in order to improve efficiencies and reduce carbon emissions.	Acknowledged in 4.1, 8.5.1 & 8.5.4	No change
25. NFU	General	In order to support and nurture a prosperous rural economy in Herefordshire the AONB should not only take account of the needs, but also seek out opportunities support farms and rural businesses who wish to enhance their businesses. Having read the consultation paper we do feel that an opportunity show support for local businesses has been missed. It is worth noting that Paragraph 28 of the National Planning Policy Framework contains a very specific reference to supporting a prosperous rural	Acknowledged in 8.5.4 & 10.2.3	No change

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		<p>economy; "Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development". It also states that plans should "promote the development and diversification of agricultural and other land-based rural businesses".</p> <p>The Defra Business Plan also contains support for a prosperous rural economy. Priority 1 of the plan is to "Support and develop British farming and encourage sustainable food production. Enhance the competitiveness and resilience of the whole food chain, including farms and the fishing industry, to ensure a secure, environmentally sustainable and healthy supply of food with improved standards of animal welfare". Therefore we feel that the AONB unit should look again at the management plan and identify areas that can be improved for the benefit of rural businesses and communities. With this in mind, our detailed comments on the consultation paper are set out below.</p>		
25. NFU	Table 9. Agriculture	<p>We do not believe that you have correctly identified inappropriate land management practices that may degrade or destroy landscape features. We do not believe that overstocking or continuous arable production are significant threats to the Special Qualities of the AONB. The national sheep flock, and cattle numbers have both reduced in the past decade. Therefore it would be helpful if you could provide evidence of the nature of the overstocking that is damaging to the AONB. Grazing animals provide a range ecosystems services and there would be other consequences if numbers were dramatically reduced. Under-grazing would become a significant issue potentially leading to pressures on other species.</p> <p>With regard to continuous arable production, this can be managed so that it is not a threat. In fact many people would be of the view that arable production is a valued part of the local Wye Valley landscape. It is also important to remember that the use of input to intensive systems (both chemical and organic) is fundamentally necessary for effective agricultural production. However nutrient inputs must be closely matched to crop requirements. Farmers understand this and considerable changes in nutrient application practices have taken place in recent years (particularly as input costs have risen). Knowledge of nutrient management techniques among the farming community is continuously improving and is available via a wide range of sources.</p>	Examples are of practices that "may" degrade landscapes; continuous arable on flood plain and overstocking of orchards and semi-improved pasture are examples. Accept that under-grazing also an issue.	Insert "under-grazing" in (eg....)
25. NFU	8.5	This section rightly identifies farming as a significant land use within the AONB area. However it has not stated that it is also an important sector in the local economy employing a significant proportion of its residents. £8.84billion GVA is added by farming to the UK economy. Farming still matters to the UK Economy and has real potential to drive economic growth for the nation. Farming also underpins the food	Accepted. Disaggregated data not available for AONB.	Insert at end of 1 st sentence "and continues to be an important part of the rural economy"

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		and drink industry which is the UK's largest manufacturing sector and the fourth largest UK exporting sector. For every £1 that farming contributes to the UK economy, our food manufacturers and wholesalers contribute a further £5.		
25. NFU	8.5.2	We think it would be preferable if the document tried to resist the temptation to use emotive and subjective language when describing the impacts of agriculture upon the environment. We do not believe it is appropriate to state that "modern agriculture has overwhelmed and threatened many of the traditional habitats and practices that have created some of the distinctive features of the AONB". The landscape has evolved to be what it is today as farming practices have changed over time.	Accepted.	Replace 'overwhelmed and redundant' with "evolved and", and insert at end of sentence "are often commercially redundant"
25. NFU	WV-F4	We agree that the future of the livestock sector is particularly important to the Wye Valley AONB. Good quality advice and support to livestock farmers is important. But equally important is a supportive framework which facilitates the growth and development of these businesses. They must be given the opportunities to invest in new techniques and technologies that will improve their productivity and yields whilst improving environmental performance. New advances in plant and animal breeding along with research and technology will allow them to achieve this. We believe that the support offered by the AONB should embrace these new techniques, helping farmers to move forward and run profitable and vibrant farm businesses. We therefore hope that policy WV-F4 will encourage the uptake of new technological advances and techniques which should be communicated to farmers within the AONB alongside more traditional land management skills.	Acknowledged	No change
25. NFU	8.5.3	We cannot support the statement that says that "farm-scale polytunnels are not normally acceptable in the AONB". A presumption against polytunnels cannot take into account individual farm circumstances and does not consider the economic justification for them. In our view there is an essential need for soft fruit farmers to use polytunnels. It is virtually impossible to produce Class 1 quality fruit as demanded by the supermarkets without using polytunnels. They are important as they extend the growing season in order to provide a reliable year round supply which is needed in order to fulfil supermarket contracts. They also help to reduce chemical use, particularly pesticides, to increase yields and to reduce costs, for example by enabling all weather fruit picking. Furthermore, this statement does not acknowledge the fact that landscape has evolved and developed because of the activities of farmers. Agricultural landscapes must be allowed to develop and in fact they are often very resilient to change. Without profitable rural businesses and farms there will be very little investment in the green infrastructure that makes the landscape so appealing. Each proposal for polytunnels should be considered on its own merits.	Accepted. Evolution of landscapes recognised in 3.1.1. Cumulative impacts of developments are also a planning consideration.	Replace 'normally' with "necessarily"

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25. NFU	8.5.4	Local markets, environmental grants and reducing costs via smart use of water, energy and nutrients are all important. We believe that intensification of production and environmental improvement can be achieved together. Our vision for the future of farming is to increase food production from existing farmland while minimising pressure on the environment.	Accepted	Insert as penultimate sentence "Utilising local markets, environmental grants and reducing costs via smart use of water, energy and nutrients are all important, alongside increasing production and environmental enhancements."
25. NFU	WV-F3	<p>We are very concerned by this policy which states" Seek to mitigate, reduce or remove agricultural activity which significantly diminishes or destroys the Special Qualities, natural beauty and landscape character of the AONB". We think that the wording of WV-F3 is inappropriate for an AONB Management Plan and should be amended or removed.</p> <p>In legislation AONBs are designated for 'purpose of conserving and enhancing the natural beauty of the area'. NE's webpage says that: "The overall purpose of AONBs is complemented by three aims: • the primary purpose of AONB designation will be to conserve natural beauty; • recreation will not be an objective of designation but AONBs should be used to meet the demands for recreation as far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other users; and • in pursuing the primary objective of designation, account should be taken of the need to safeguard agriculture, forestry, other rural industries and of the economic and social needs of local communities."</p> <p>As you can see the AONB should be taking a more even hand on economic development to 'safeguard' agriculture within the AONB. It is overstepping the remit of the AONB to seek to reduce or remove legitimate agricultural practices from the AONB.</p>	<p>Agree the purpose of AONB designation is to conserve natural beauty and therefore legitimate to seek to reduce or remove practices that do not safeguard this. Accept that there is a hierarchy of education, mitigation and/or reduction before confrontation and removal, which would be controlled through other policy mechanisms.</p>	<p>Modify to read: "Seek to mitigate &/or reduce, or as a last resort remove, agricultural activity which significantly diminishes or destroys the Special Qualities, natural beauty and landscape character of the AONB"</p>
25. NFU	9.1	An opportunity has been missed in this section to acknowledge the importance of the planning regime to economic development in the area. The Defra Business Plan also contains support for a prosperous rural economy. Priority 1 of the plan is to "Support and develop British farming and encourage sustainable food production. Enhance the competitiveness and resilience of the whole food chain, including farms and the fishing industry, to ensure a secure, environmentally sustainable and healthy supply of food with improved standards of animal welfare". Housing development of a suitable size and scale should be encouraged in the AONB in order to maintain vitality and	This section explains the planning context of the AONB, not the function of planning. 10.2 covers Economy and Rural Regeneration	No change

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		support the development of sustainable rural communities.		
25. NFU	WV-D3	This is very subjective when it says 'Resist inappropriate development'. Who makes that decision? It would be helpful to have a statement supporting appropriate development contributing to the economy.	Planning decisions are made by Local Planning Authority or Planning Inspector or Secretary of State. 10.2 covers Economy and Rural Regeneration	No change
25. NFU	9.3	Please bear in mind that a strong mobile signal is vital for the operation of rural businesses. Many people now operate via mobile phones rather than via landlines. We must not forget the importance of mobile signal strength in rural areas and any steps taken to remove or reduce the prominence of hilltop telecommunications structures should be balanced with the potential impact on signal strength. We would also like to see more support for rural broadband as this will help communities to develop economically and will reduce social exclusion by enabling access to services.	Acknowledged	No change
25. NFU	9.3	We would welcome support for the generation of renewable energy within the AONB. Farming has the potential to deliver many forms of clean energy, including bioenergy created from animal waste and biofuels generated from crops. These technologies continue to develop and the AONB should support growth in this sector. Farmers within the Wye Valley area are ideally placed to benefit from these technologies and they have a vital role to play in providing new sources of decentralised energy.	Acknowledged in 9.3.1 but could include references in 8.5.	Insert in 8.5.1 reference to "renewable energy production" Add in 8.5.3 "and fuel" to 'The production of food...'
25. NFU	9.3	The Wye Valley AONB benefits from having some trunk road and rail links to the main settlements but most of the area is deeply rural in character and is accessed via minor roads. It is important to note that farms and rural businesses are totally reliant on HGV and car transport. Rural communities are likely to remain reliant on private car transport into the future, but this does not automatically mean that rural communities are unsustainable. A balance needs to be struck between the development of farm and rural businesses and traffic impacts. It may therefore be appropriate to sensitively improve transport infrastructure in the AONB in order to enhance economic development in the area.	Accepted	9.4.1 Add to end of 4 th sentence "and rural businesses" and add to 5 th sentence "produce," after 'two way flow of...' 9.4.2 Insert new 5 th sentence: "Sensitively improved transport infrastructure in the AONB can enhance economic development in the area."
25. NFU	10.2	We are very supportive of this section as it acknowledges the importance of a vibrant economy to the communities and management of the AONB. However, as we have stated above, we think that the importance of the economy should be strongly	'Economy' referenced in 2.1.7, 2.1.8, 2.2.1 (6 th & 7 th)	No change

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		incorporated into to other elements of the plan.	bullets), 3.2.2, 3.2.7, 4.1.1, 4.1.3, 5.4.6, Table 9 (Agriculture, Positive Impacts), 7.1.4, 8.5.1, WV-F5, 8.6.7, 9.4.2, 10.1.5, 12.2.2.	
25. NFU	10.2	As we have stated, farming businesses have an essential role in maintaining the AONB landscape by grazing livestock, maintaining hedgerows and participating in agri-environment schemes. These farms will also need to invest in new buildings or other infrastructure as animal welfare and environmental requirements change. They may also need to diversify their businesses, perhaps by supplying local produce through farm shops.	Acknowledged in Table 9 Positive Impacts '•Landscape custodianship of farming' and WV-F5 & WV-F7	No change
25. NFU	10.2	We would therefore like to see a policy which says that it will actively support farming and diversification. This policy should also make a more specific reference to the needs for agricultural businesses to develop. Agricultural business located within the AONB have to respond to the same pressures to comply with higher welfare and environmental management standards in the same way as those businesses located in other areas of the county. Steps should also be taken to reduce any barriers to farm development.	Diversification is referenced in 3.2.4, 3.3.2, Table 9 Positive Impacts •Economic generation of agricultural enterprises... and •Diversification allowing farmers to continue farming. 8.1.2 & 8.5.1. Support for farming & diversification inherent when there is no conflict with the purpose of AONB designation, as in WV-F1, WV-F2, WV-F4, WV-F5, WV-F6, WV-F7, WV-D2, WV-E1, WV-E2, WV-E4	No change
25. NFU	4.3	We are interested in developing the role of the farming community as the key deliverers of a range of ecosystems services, and would like to learn more about how	Acknowledged	No change

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		you feel the concept will develop in the AONB. One of our key aims would be to ensure that the contribution of the landowner towards ecosystems services is adequately acknowledged and valued. In our view food production is often overlooked as a primary ecosystem service and farmers are being increasingly tasked to improve our national food security. We would be keen to facilitate a discussion with local farmers in order to capture their views on the concept and the practicalities of incorporating recognition for the provision of ecosystems services into existing farm businesses.		
25. NFU		We would like to see more support and encouragement for water efficiency measures in the AONB. This is important as water stress may increase in the future. We would also like to explore potential for farmers to capture and store water. New farm reservoirs will be necessary to facilitate sustainable and efficient irrigation in the future. We are disappointed that plan does not include more robust support for on farm water storage and farm reservoirs. There is a particular opportunity where these reservoirs take and store peak flows during winter rainfall events.	8.5.4 recognises role agriculture can play in managing water quality and quantity. WV-U4 relates to 'use and supply of resources, including water...'	Add to Table 9 Positive Impacts "and water regulation" to '•Ecosystem services including flood storage' Insert in 9.3.3 new 4 th sentence "On farm water storage is becoming necessary to facilitate irrigation."
25. NFU		It is also important that new housing developments are not built in areas that flood, so that communities are not exposed to risk and economic losses. Sustainable Drainage Systems are particularly important as it allows communities to take responsibility for and manage their own surface water runoff. These systems should be retrofitted to housing developments wherever possible. In the recent past many farmers have suffered from land damage and water logging (which has resulted in a loss of food production) where nearby developments have increased run off and surface water flooding and therefore the impacts of adjacent land must be considered.	Acknowledged. This is government policy included in National Planning policy Framework (NPPF) paragraph 103.	No change.
26. CRT	11.1	In the tourism section we would like to see some reference to the application of Destination Management principles not least because both Visit Wales and Visit England are committed to the process and each of the county areas is working towards (or implementing) a destination plan. Indeed destination management as a process would also help point up the special qualities of the AONB for communities, businesses and visitors alike as well as helping the place 'work' for everyone.	Accepted	Insert new para 11.1.8 "The key strategic tourism partners in and around the Wye Valley and Forest of Dean are now working together as a Destination Management Organisation with an emerging Wye Valley and Forest of Dean Destination Management Plan. This will help

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				communities, businesses and visitors alike make the most of the special qualities of the AONB as well as helping the place 'work' for everyone."
27. Sue Parkinson	General	One of the new threats to the AONB may be fracking. There was a report in the Hereford Times during the summer about certain areas of the AONB which have shale gas resources, but I don't know how credible the reports were (Fownhope and Much Marcle were mentioned). Should fracking be proposed and implemented, there would be significant risks to water resources, both in the quantities of water used, the storage of polluted water and potential pollution of aquifers. In addition there are the number of lorry movements required to transport the large quantities of water that is used to extract the shale gas during the fracking process. The current government seems very keen on encouraging fracking to ensure energy security. I am not aware of any shale deposits in the Monmouthshire portion of the AONB, so can't really make a response like this on behalf of the EPB, although by its very nature pollution of water courses will have an impact downstream of the point of entry.	The government has accepted amendments to the Infrastructure Bill that will see fracking banned in national parks, Areas of Outstanding Natural Beauty and sites near to groundwater sources.	No change