

Comments on the Public Consultation Draft Management Plan (September 2019) 2020-2025.

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 2015-2020. A Consultation Draft AONB Management Plan 2020-25 was published in September 2019 with a 12 week public consultation period. In addition two public ‘drop-in’ events were held, in Ross & Brockweir, in December 2019 to provide further opportunities for everybody to inspect and comment on the Plan. A total of 18 organisations and individuals submitted comments on the Consultation Draft AONB Management Plan, amounting to over 230 specific comments. These came from representatives of 9 Public Sector organisations, 5 voluntary/NGO/3rd sector bodies and 4 Private Sector organisations or individuals. Those comments and the formal responses and consequent recommended amendments to the AONB Management Plan are tabulated below.

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.	EHT (Herefordshire and Worcestershire Earth Heritage Trust)	Moira Jenkins	Herefordshire and Worcestershire Earth Heritage Trust, Geological Records Centre, University of Worcester, Worcester WR2 6AJ	3rd
2.	HC Cllr (Herefordshire Council)	Councillor Yollande Watson		Public
3.	RTC (Ross Town Council)	Town Clerk	The Corn Exchange, High Street, Ross-on-Wye, HR9 5HL	Public
4.	HC Cllr (Herefordshire Council)	Councillor Paul Symonds		Public
5.	Walford Cllr	Cllr Sian Newbert	Walford Parish Council	Public
6.	Resident A	Private resident	Bishopswood	Private
7.	NFU	Sarah Faulkner, Regional Environment Adviser	NFU West Midlands	Private
8.	GWT (Gloucestershire Wildlife Trust)	Dr Gareth Parry Director of Conservation	Gloucestershire Wildlife Trust, Robinswood Hill Country Park, Reservoir Road, Gloucester, GL4 6SX	3rd
9.	GCC (Gloucestershire County Council)	Rob Niblett Planning Officer	Gloucestershire County Council, Shire Hall, Gloucester, GL1 2TH	Public
10.	F65B (Friends of the 65 Bus)	Friends of the 65 Bus: Brian Mahony, Jane Gilliard, Rosemary Corcoran	The Narth, Monmouthshire, NP25 4QG	3rd
11.	Resident B	Private resident	Woolhope	Private
12.	Woodland Trust	Heather Elgar Regional External Affairs Officer - South West	Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL	3 rd
13.	Coleford TC (Coleford	Annie Lapington	No 1, The Town House, Lords Hill Walk, Coleford, GL16 8BD	Public

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	Organisation	Lead Contact	Address	sector
	Town Council)	Town Clerk		
14.	HC (Herefordshire Council)	Angela Newey Senior Planning Officer	Strategic Planning, Economy and Place Directorate Herefordshire Council	Public
15.	HE (Historic England)	Rosamund Worrall Team Leader (Development Advice)	Historic England	Public
16.	HWT (Herefordshire Wildlife Trust)	Andrew Nixon Conservation Senior Manager	Herefordshire Wildlife Trust	3rd
17.	NRW (Natural Resources Wales)	David Letellier Land and Assets Manager, South East Wales	Natural Resources Wales	Public
18.	Resident C	Private resident		Private

Organisation / Name	Paragraph / Policy	Respondent's comment, change or addition	Response	Recommendation
EHT	2.1.2	Add more detail to be the equivalent of the biodiversity section. Insert 'The Wye Valley AONB contains 2 Sites of Special Scientific Interest (SSSI) designated for their geology. There are also 26 designated Local Geological Sites (LGS) which used to be known as Regionally Important Geological / Geomorphological Sites. These include sites designated for both rocks formed in marine conditions, some of which are highly fossiliferous and those deposited on semi-arid land surfaces. There are deposits of iron minerals, river terraces formed in interglacial conditions, landslip areas and calcareous tufa deposits which are still forming.'	Accept but edit slightly	Add to end of 2.1.2: "There are 2 geological Sites of Special Scientific Interest (SSSI) and 26 designated Local Geological Sites (LGS). These include sites with rocks formed in marine conditions, some highly fossiliferous, and some deposited on semi-arid land surfaces. There are deposits of iron minerals, river terraces formed in interglacial conditions, landslip areas and calcareous tufa deposits which are still forming."
EHT	2.1.9	Slight changes suggested to Geological Section of Special Qualities, to read 6. Silurian Rocks which are marine sandstones, limestones and shales with mudstones in the Upper Silurian which are the lowest of the terrestrial Old Red Sandstone rocks. 7. Lower Devonian rocks which contain mudstones, sandstones and calcretes, the continuation of the Old Red Sandstone rocks. 8. Upper Devonian Quartz Conglomerate and Tintern Sandstone 9. Carboniferous Limestone laid down in clear tropical seas and the overlying Coal Measures deposited on land in equatorial regions.	These are descriptions and definitions, so better placed in the 'Recognition' column of Table 8 and in the Glossary. Amend 7. to read "Lower Devonian Old Red Sandstone"	Amend 7. Add all definitions to respective 'Recognition' column of Table 8 and in the Glossary.
EHT	3.2.6	Tourism and Recreation: add extra sentence 'Sustainable Geotourism, using available trail guides and Apps, can draw visitors away from 'honey pot' sites and encourage more visitors to look at different aspects of the area.'	Add to new para after 8.3.1 in Geodiversity section	Add new para after 8.3.1 in Geodiversity section
EHT	4.2	Natural Capital: Geodiversity adds to Natural Capital and Ecosystem Services. Add to bullet point to read • Conservation of biological and geological diversity;	Accept	Amend
EHT	5.5.1	A Joint Advisory Committee (JAC): It would be useful if the JAC included someone with geological knowledge as the whole AONB is there because of the geodiversity which underpins and shapes everything and influences the animals and plants which	Noted. This can be considered when the constitution of the	No change.

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		thrive and the use that can be made of the land.	JAC is next reviewed. JAC meetings are open to the public and people with geological knowledge are welcome to attend.	
EHT	Table 2	Add one more bullet point at bottom right. LMZ01 Woolhope Dome: Features and link to Special Qualities [SQ] <ul style="list-style-type: none"> Sandstone at heart of dome, surrounded by concentric limestone ridges separated by clay vales. 	Accept	Amend
EHT	Table 8	Special Qualities: Geological 8. Quartz Conglomerate is not between Upper and Lower Old Red Sandstone. Correct as 'Quartz Conglomerate Upper Devonian Upper Old Red Sandstone'	Better placed in the 'Recognition' column of Table 8 and in the Glossary.	Amend
EHT	8.3	GEODIVERSITY ADD A DEFINITION OF GEODIVERSITY HERE OR IN APPENDIX III. 'Geodiversity is a term for these non-biological aspects of nature. ... Geodiversity may be defined as the natural range (diversity) of geological features (rocks, sediments, minerals, fossils, structures), geomorphological features (landforms and physical processes) and soil features that make up the landscape. Geodiversity underpins and shapes the topography and determines the use that can be made of the land and the plants and animals which will thrive there.'	Accept	Add Definition to Glossary
EHT	8.3.1	Add extra description of the geology. 'The Woolhope Dome is an area of upfolded Silurian rocks which has sandstone at its heart surrounded by concentric ridges of limestone separated by clay valleys. This is separated from the Wye Valley by the Woolhope Fault. The form of the Wye Valley reflects the underlying rock. In the north where the valley is wider, there are upper Silurian mudstones, the lowest of the Old Red Sandstone rocks. Further south are Lower Devonian Sandstones which give a meandering narrow valley with sloping sides and interlocking spurs. This type of topography is repeated as the Welsh Border is crossed north of Monmouth. Away from the river valley are hills and plateau lands underlain by Lower Devonian sandstone. In the Wye Gorge area there are sheer cliffs of Carboniferous limestone with deeply incised meanders. This topography is repeated again on the limestone areas towards the Chepstow area. Other hard rock bands such as the Quartz Conglomerate stand out as crags on the hillsides, such as on Great and Little Doward and at the Kymin. The higher land of the Forest of Dean	Accept	Amend

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		plateau stretching as far north as Chase Wood and Penyard Park has more resistant rock, the Upper Devonian Quartz Conglomerate, Carboniferous Limestone and Coal Measures.'		
EHT	Appendix II	ACRONYMS AND ABBREVIATIONS Amend EHT entry to 'EHT - Earth Heritage Trust, which is the geoconservation group for Herefordshire and Worcestershire.'	Accept. This was a generic term for groups in the 3 counties, but they no longer seem operative	Amend.
HC Cllr	General (4.2)	Natural Capital: Do the indicators in the Management Plan inform a Natural Capital Assessment of the Wye Valley AONB?	The accompanying State of the AONB Report contains data that can assist with Natural Capital Assessment.	No change
HC Cllr	Table 2 & Map 2	How far into the landscape does the Wye Gorge cover? Howle Hill, Kiln Rise, Leys Hill are in Archenfield but is not part of the LMZ08 'Walford Lowland' but has a Linear settlement pattern (LM09)	Howle Hill, Bulls Hill and Leys Hill are included in Wye Gorge LMZ9.	No change
HC Cllr	Table 8.	SQ24: some sections still have stiles (Howle Hill to Bulls Hill)	Noted	No change
HC Cllr	Table 9	Light pollution: Is there a Dark Skies policy for the AONB?. There is a growing number of people moving to the AONB who are bringing lighting schemes with them	Light pollution is mentioned in WV-D3. But acknowledge that Dark Skies conservation & enhancement developing, particularly with Welsh AONBs & National Parks.	Insert new paragraph after 9.1.10 "9.1.11 Darks skies are an intrinsic aspect of the countryside. Light pollution is avoidable through improved design, better enforcement of planning guidelines and innovative new technologies. Lighting should only be installed where and when needed, following guidance and good practice for intrinsically dark zones.

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				Designs should avoid spilling light including large areas of glazing which can appear as boxes of light in the countryside at night, and glinting glazing in the daytime. Opportunities should be sought to remove or replace existing inappropriate external lighting to restore dark skies. Householders, farms, community facilities, recreational facilities and businesses in the AONB can take simple steps to reduce light pollution by: <ul style="list-style-type: none"> ● Angling existing lights downwards ● Fitting timers ● Replacing existing lighting with designs appropriate for intrinsically dark zones.”
HC Cllr	Table 9	Could fireworks be included under Noise Pollution?	Not recognised as a significant or persistent threat.	No change.
HC Cllr	9.1	WV-D2 – include housing designs to adhere to the ‘National Design Guide, Oct 2019’ (https://www.gov.uk/government/publications/national-design-guide) written by Ministry of Housing, Communities and Local Government)	Agree reference to the National Design Guide is appropriate. This would be better in the accompanying text, in para 9.1.3. Also need to reference Welsh	Add to end of 9.1.3. “Development that is “good enough to approve” should demonstrate how it follows the ‘National Design Guide, October 2019’ and Welsh Government’s ‘Design’

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			Government 'Design' Technical Advice Note (TAN) 12: March 2016.	Technical Advice Note (TAN) 12, March 2016."
HC Cllr	12.2	Replace introductory sentence with 'People come to live and work in the Wye Valley AONB because of its special qualities. Therefore, it is important to understand that we all share a responsibility for protecting and restoring this internationally important and protected landscape for future generations to enjoy.'	The intention is for this to be engaging rather than lecturing.	Add to start of introductory text; "We all share a responsibility for protecting and restoring the outstanding natural beauty for ourselves and future generations to enjoy."
HC Cllr	12.2.4	Get out there and enjoy it: insert 'natural' before "asset".	"natural" is already used once in that sentence.	No change
HC Cllr	12.2.6	Slow down for people, horses and wildlife: Modify to read: 'Traffic spoils enjoyment of the Wye Valley for a great many of its residents. Speeding cars kill people, horses and wildlife, erode ancient greenways and damage rare plants by inconsiderate driving and parking.'	Modification does not improve context or meaning; Speeding cars are not cause of erosion to greenways.	No change
HC Cllr	12.2.8	Maintain the rural nature of your property: Modify to read: The use of traditional materials and skills, such as drystone walling and hedgelaying, helps retain the AONB's valued rural feel, which is in danger of being gradually eroded through the use of inappropriate and urban materials and features, eg. plant a hedgerow instead of a erecting a fence.	Accept, with added inclusion of "planting a 'native' hedgerow".	Amend
HC Cllr	12.2.9	Help prevent the spread of invasive and harmful plant and animal species: Add to end: 'Seek advice from local experts before planting or introducing a non-native species into local landscape.'	Accept	Amend
HC Cllr	12.2.10	Avoid using the car where possible and consider using renewable energy in your home: Add 'and wildflowers' after "wildlife"	Accept	Amend
HC Cllr	12.2.13	Get involved – support local conservation organisations: Add "and groups" and amend to read: With your financial and practical support, local conservation organisations can take action to safe-guard the AONB landscape such as monitoring threatened wildlife,	Accept	Amend

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		undertaking practical conservation tasks and lobbying local and central government.		
HC Cllr	12.2.14	Have a say: Amend to read: 'Your views can influence the care of the area – engage in consultation processes operating at a Community/Parish/Town, district, county and AONB level to steer policy and action that affects the area. Meanwhile, learn what geological, ecological, archaeological and historic features are in your area and report damage to them.	This action is about engaging in consultations and reporting damage. Learning about the area would be better covered in 12.2.1.	No change to 12.2.14. Add to 12.2.1 "Discover what geological, ecological, archaeological and historic features are in your area."
RTC	general	The Council noted there are some items in the Draft Consultation outside of its control but many of the aspirations are already held by the Council. The Council agreed the draft document is comprehensive in its approach to managing the AONB. The Council understand this interim review is intended to be a light touch review and recognises it is a useful document which can be referred to when making its decisions and in ensuring the framework is consensual for a more joined up approach with other stakeholders, particularly in its management of land within the AONB. The Council is happy to approve the Draft and confirm it wishes to raise no comment other than in support.	Noted	No change
HC Cllr	general	My only observation is that it seems largely reactive, describing how the AONB will manage threats & opportunities which arise. I'd like to see some specific objectives such as planting XX new trees or working with local bus operators to facilitate at least 4 bus services between Newport & Hereford every Saturday & Sunday from April to October from 2020. Where do 'hard' objectives like these sit?	The Management Plan, under CRoW Act Section 89, formulates local authority policy and action in relation to the management of the Wye Valley AONB. All actions should further the purpose of designation (conserving & enhancing natural beauty) which have to be achieved through partnership. Setting targets for LAs outside the AONB or for private	No change

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			landowners is purely theoretical. The accompanying Action Plan outlines what the AONB Partnership intends to achieve.	
Walford Cllr	12.2.14	'A Charter for residents and visitors': Have a say. How do people 'Have their say'? It would be good to include contact details for reporting damage or other concerns relating to geological, ecological, archaeological & historic features. People (particularly residents) are very interested in their environment but often don't know where to go or what needs reporting. Generally more 'Protect & Preserve' guidance and information would be very valuable & a useful resource.	Noted. The AONB website is the most appropriate place for such information.	No change
Resident A	9.1.2	I am delighted that the most recent NPPF has added 'enhancing' the landscape and scenic beauty of the AONB to the previous policy of only 'conserving' it.	Noted	No change
Resident A	9.1.3	Also that the AONB policies in the NPPF, Section 172, will now take precedence (?not precedent?), para 141, footnote 6, over any presumption in favour of sustainable development. This should enable those responsible for the Management Plan to take a stronger stance on any future monstrosities	Noted	Delete "precedent", replace with 'precedence'
NFU	general	The plan sets out a number of themes that have a direct impact upon our members whose businesses form the bedrock of the rural economy in the Wye Valley and the wider area. The NFU is a trade association representing the interests of 47,000 farm businesses in England and Wales. Farmers are largely responsible for maintaining the special features that are valued in landscapes like the Wye Valley. These features have developed as a result of generations of farming activity and there have been many changes over time. Farming businesses and techniques will no doubt continue to change and therefore the challenge is to grow sustainable and profitable farming businesses whilst also safeguarding the special qualities of the landscape. Farming businesses face many challenges and are currently in a period of considerable uncertainty. Many of their challenges are global as well as local as their activities are influenced by worldwide supply chains. In our view, support for farming, growing and rural businesses should not be confined to encouraging diversification and must include a focus on improving the competitiveness and quality of rural businesses. The management plan should support them in maintaining sustainable rural businesses and	Noted	No change

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		delivering a quality food, therefore we are pleased that the strategy acknowledges the importance of agriculture to the rural economy. The UK food and farming sector is worth a staggering £108 billion to our economy, more than the aeronautical and automotive manufacturing sectors combined, and represents around 3.9 million jobs.		
NFU	8.5	Agriculture: We would like to see a more specific reference to supporting the farms and rural businesses operating in the area, particularly with regard to productivity and growth. As you know much of the natural environment is farmland and it is maintained by farming businesses who make considerable and long term investments in maintaining environmental and landscape features. These combine to create a landscape that has a wide economic benefit for communities and other businesses alike. The strategy should include a specific statement supporting investment in new infrastructure which very often improves environmental performance and sustainability e.g. new slurry storage structures.	Para 8.5.3 addresses productivity and growth in the context of sustainable development. Agree that investment in infrastructure which improves environmental performance, sustainability and conserves and enhances the landscapes should be supported.	8.5.3 Insert in 4 th sentence: '... , water & slurry storage...' Insert at end of para: 'However, investment in infrastructure which improves environmental performance, sustainability and conserves and enhances the landscapes should be supported.' Insert new Strategic Objective 'Identify good agricultural practices that are appropriate to the challenges facing the farmers of the AONB and disseminate through networks, partnerships and training.'
NFU	8.5	It is important to acknowledge that productivity gains can also bring environmental benefits. For example, targeting nutrient and other inputs can improve yields but also has many benefits for soil and water management. Investment in agricultural practices, infrastructure and technology that deliver environment and animal welfare benefits should also be supported.	Para 8.5.4 addresses productivity gains and environmental benefits. Agree that investment in agricultural practices, infrastructure and technology that deliver environment and animal welfare benefits should also be supported.	Insert as penultimate sentence 'Investment in agricultural practices, infrastructure and technology that deliver environment and animal welfare benefits should be supported.' Insert new Strategic Objective 'Identify good agricultural practices that are appropriate to the

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				challenges facing the farmers of the AONB and disseminate through networks, partnerships and training.'
NFU	8.5	The plan rightly acknowledges the current uncertainty regarding UK agriculture post Brexit. There will be opportunities to promote local produce, however it must be acknowledged that the majority of business in the area produce commodities that are traded globally and therefore their activities will be influenced by a wide variety of factors.	This is noted in 8.5.2.	No change
NFU	WV – F3	We are very concerned by policy WV – F3 “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” We have already received calls from concerned farmers who are worried about the tone of the policy. Overall it sends out a very negative message to farmers in the AONB and risks disenfranchising those farmers already feel unsupported by the AONB. We question how the policy can be implemented: <ul style="list-style-type: none"> • Who determines which agricultural activities are detrimental? • The AONB does not have regulatory powers to limit agricultural activities and therefore how can it be taken forward? Therefore the policy should be removed as it cannot be implemented under the current regulatory framework.	Accepted	Delete wording of WV-F3 and replace with new Strategic Objective ‘Identify good agricultural practices that are appropriate to the challenges facing the farmers of the AONB and disseminate through networks, partnerships and training.’
NFU	General	Natural Environment Farmers and landowners must be fully engaged with discussions on the natural environment as they own and manage many of the areas key green and blue infrastructure assets. For many farmers environmental management is a core business activity. Previous studies have shown that agricultural businesses routinely invest in landscape management and enhancement works for example hedging, tree planting, cutting and grazing. For many farmers the landscape management and biodiversity enhancements on their farms are a source of great pride. Farmers who do not (for a variety of reasons) participate in agri-environment schemes also make valid contributions. The work of the Campaign for the Farmed Environment (www.cfeonline.org.uk) has shown that these farms use a range of voluntary techniques to enhance biodiversity and that this management is funded by farm businesses.	8.5.4 recognises this, particularly the 1 st sentence.	No change
NFU	General	Litter and flytipping We are pleased that this issue has been included in the charter for residents and	Table 9 Activities & Pressures lists Fly	Amend Table 9.

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		visitors. Fly tipping is becoming a scourge in the countryside and has a detrimental impact on environmental quality with farmers often bearing the costs of clean up. Therefore measures should be developed to assist them and others in their endeavour to tackle the issue. Litter also has a detrimental effect on farm businesses and any measures to raise awareness of the issue and the effects on food production and animal welfare are to be welcomed.	tipping. Negative impact should recognise that farmers & landowners have to bear costs of clean up on their land.	
NFU	General	Telecommunications Poor mobile reception is a vital issue as rural businesses rely on it, particularly when lone working, we have heard that quality and reliability have reduced in some areas. It is vital that the coverage is improved and maintained in order to allow businesses to function and grow, but also to safeguard the health and safety of those living and working in rural areas. We are pleased that the draft plan recognises the need to improve the current broadband infrastructure particularly in rural areas. Digital connectivity is vital for farming businesses as they need to access online bookkeeping, tax, Basic Payment Scheme, and online mapping. Fast broadband is no longer an "add on" but a fundamental necessity for operating a business.	Noted	No change
NFU	General	Water resources The plan acknowledges that on farm water storage is required for irrigation. It is likely that additional water storage infrastructure will be needed in the Wye catchment in order to store water and plan for water resilience in a changing climate. There are likely to be winter water storage opportunities for a wide range of sectors. Care is needed, but well-designed schemes can and should be integrated into the landscape. Our experience this summer showed that the livestock sector was just as vulnerable as other sectors during drought conditions and therefore a wide range of resilience measures should be considered. This is a key emerging issue for the farming sector and therefore we would like to see additional support within the plan for on-farm water storage.	Noted. Wording added to 8.5.3 to further reference water storage and support investment in infrastructure which improves environmental performance, sustainability and conserves and enhances the landscapes.	See changes above to 8.5.3.
NFU	General	Built development On page 58 the plan acknowledges that sensitive barn conversions can deliver positive benefits in terms of the historic environment. We would like to see additional support for the conversion of redundant rural buildings in the plan. We have had calls from members who are concerned that there is a wide variation in planning policy between the local authorities in the AONB. Supporting this form of development would secure	WV-D2 supports good developments, which barn conversions have the potential to be. WV-D1 aims to	No change

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		the future of these buildings.	secure consistent planning policies across the AONB.	
NFU	General	Built development The plan should acknowledge that new farm buildings and infrastructure will be required in the future to enable businesses to grow and remain sustainable. For example, new livestock buildings may be required where older building stock cannot keep pace with animal welfare requirements. New infrastructure may be required to facilitate the management of slurry etc and this sort of development brings many environmental benefits.	Noted.	See changes above to 8.5.3 & 8.5.4.
NFU	General	Polytunnels The British soft fruit industry has been highly successful in producing a range of fruit over a longer growing period by taking advantage of advances in technology. It has been a particular success story for Herefordshire where growers contribute significantly to the local agricultural economy. They grow to meet the British consumers demand for soft fruit which would otherwise be met by foreign imports, considerably adding to CO2 emissions and thereby contributing to climate change. There is currently no alternative to using polytunnels if the area is to continue to have a thriving soft fruit sector.	Accepted. Polytunnels remain under the control of national and local planning policy.	No change
NFU	General	Renewable energy schemes The plan addresses the need for renewable energies and technologies. Farming has the potential to deliver many forms of clean energy, including bioenergy created from animal waste to biofuels generated from crops. Farmers within the area are ideally placed to benefit from these technologies and they have a vital role to play in providing new sources of decentralised energy. Schemes should be planned sensitively, but should be permitted in order to reduce our reliance on fossil fuels. Bioenergy from biomass crops can also have a place when planned sensitively.	Noted	No change
GWT	General	The Wildlife Trust supports regular review of management plans as good practice and acknowledges that this review was required in order to maintain an active and up-to-date management plan. The management plan review follows the recent release of the UK Government's Landscapes review report, which made six proposals for re-thinking national landscapes. Whilst accepting that the release of this report probably came too late to be fully incorporated into the AONB management plan review, greater reference to the recommendations of the Landscapes review within the revised Management Plan would be desirable.	Context and reference to the Glover Review noted, however, there is also the Marden Review and subsequent process in Wales.	Insert new paragraph 5.2.7 referencing Review of Designated Landscapes in Wales & England.
GWT	General	In particular, GWT would like to see the purpose and aims put a greater emphasis on nature recovery, in line with the key proposals from the Landscape review report to	There are references to Nature recovery in	No change

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		expand the purpose of national landscapes.	Sections 8 & 10.	
GWT	2.1.3	The Statement of Significance should be updated to mention that it is one of the few locations where pine martens are currently found in England.	Accepted	Insert after 7 th sentence "In 2019 Pine Martens were re-introduced to the area."
GWT	3.2.1.7	GWT wholly supports the sentiment and aims of this paragraph.	Noted	No change
GWT	3.2.1.8	Building with Nature was developed in Gloucestershire and is the only nationally recognised benchmark of excellence for Green Infrastructure. GWT recommends that preference for development within the AONB attaining Building with Nature standards is added to this section.	Accepted.	Insert at end of 3.2.1.8 "Building with Nature was developed in Gloucestershire and is a nationally recognised benchmark of excellence for Green Infrastructure." Insert at end of 9.1.6 "Development in the AONB should be a benchmark of excellence for Green Infrastructure, utilising nationally recognised standards such as Building with Nature." Insert in WV-D2 "and Green Infrastructure"
GWT	3.2.4	The issue of replacing ash in SSSI's needs to be clarified as sycamore cover beyond 15% is unlikely to be acceptable for Natural England. There may need to be some targeted planting combined with natural regeneration of suitable species.	Noted	Rephrase penultimate sentence to "...forest cover will continue but other species including Sycamore will replace the Ash..."
GWT	4.1.5	For the English part of the AONB reference to Biodiversity Net Gain would be appropriate under the sustainable development paragraph.	Accepted, but more appropriate in Natural Capital section 4.2.	Insert new paragraph "4.2.4 In England, Biodiversity Net Gain is an approach to development that leaves biodiversity in a better state than before. Where a development has an

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				impact on biodiversity it encourages developers to provide an increase in appropriate natural habitat and ecological features over and above that being affected. The intention is that the current loss of biodiversity through development will be halted and ecological networks can be restored.”
GWT	4.2.1	GWT supports the adoption of the Ecosystem approach to conservation.	Noted	No change
GWT	4.2.3	An assessment of Natural Capital across land in Gloucestershire is due to be produced by the Gloucestershire LNP in 2020.	Noted	No change
GWT	4.4.5	Will the landscape approach need to be modified in respect to conservation of characteristics if changes in farming systems drive inevitable changes to landscape character? If not how will the transition to a ‘public goods’ subsidies model be managed in this respect?	The landscape is dynamic and the Landscape approach reflects this. There is close alignment between the constituent features of landscape character and their ‘public goods’.	No change
GWT	6.4.1	GWT has led development of a standardised spatial monitoring methodology for biodiversity and natural capital based on OS grid squares that could be used a standardised collection unit within the AONB. It is often possible to translate other data from other geographical units into this system.	Noted	No change
GWT	Table 3	Are any significant changes in the proportions of land types anticipated over the next 5 years due to changes in farming, ash dieback etc?	There will inevitably be some changes, and these are monitored. But significant change is land types in not anticipated.	No change
GWT	Table 9	Whilst it is good that the potential positive impacts of agriculture on biodiversity are acknowledged, it must also be clear that intensive farming has one of the biggest	Noted	Add to 1 st bullet “and intensive management”

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		negative impacts on biodiversity.		Add to 3 rd bullet "and associated biodiversity"
GWT	Table 9	Negative impacts of light pollution must include biodiversity, particularly bats.	Accepted	Insert new bullet "• Poorly designed or directed lighting can disrupt biodiversity and disturb species behaviour, particularly bats"
GWT	Table 9	There are some activities where one negative impact could cause conflict within local communities e.g. flooding, field sports. Would it be appropriate to recognise this?	The impacts are primarily assessed against the Features & Special Qualities of the AONB rather than wider cumulative impacts.	No change
GWT	7.1	Considering the proposals made by the Landscape Review, GWT would like to see one of the main thematic aims focus on 'recovering and enhancing nature'.	Noted; 'and restore' was omitted in error from 7.1.2 2 nd bullet – in relation to AONB Aim after 8.2.11.	Amend
GWT	8.2.7	GWT welcomes the recognition that 'Nature recovery is central to the conservation and enhancement of natural beauty'. Reference to 'enhancing and restoring ecological networks' within the strategic biodiversity objectives would be welcomed.	Noted	WV-B3 Insert after 'ecological systems' " , networks"
GWT	8.2	Whilst the strategic biodiversity objectives are suitable and well thought out, many rely on organisations that have little or no government support. The objectives WV-B2, WV-B4 and WV-B5 will be difficult to achieve without substantial input from NGO organisations, including (but not limited to) the Gloucestershire Centre for Environmental Records Centre and GWT. Whilst there is a lot of good will to assist, charities cannot be expected to subsidise government bodies. The strategic objectives should be cost assessed to check if they are achievable if resources to fund the essential work of partners is not available.	The Plan both sets out policies for the Local authorities and is a tool for partners. This helps attract funding and resources to deliver the Plan and consequently support partner NGOs. However it is recognised that aspects do remain aspirational.	No change
GWT	8.5	It is rightly acknowledged that the changes facing farmers are considerable. Would it	Noted. Support for	See responses to NFU and

Organisation / Name	Paragraph / Policy	Respondent's comment, change or addition	Response	Recommendation
		be appropriate for one of the objectives to reflect this and focus on supporting farmers to transition?	farmers is encouraged in WV-F1. F2 & F4. See also responses to NFU and additions to 8.5.3, 8.5.4 and WV-F3	additions to 8.5.3, 8.5.4 and WV-F3
GWT	9.1	Ensuring that developments within the AONB achieve the Building with Nature Benchmark standards could be a suitable objective here.	Accepted. See 3.2.1.8 above.	Insert at end of 9.1.6 "Development in the AONB should be a benchmark of excellence for Green Infrastructure, utilising nationally recognised standards such as Building with Nature." Insert in WV-D2 "and Green Infrastructure"
GWT	12	As with section 8.2. Some of the objectives rely on organisations that have little or no government support. The strategic objectives should be cost assessed to check if they are achievable if resources to fund the essential work of partners is not available. One way to be more cost effective and promote engagement of partners (also reducing carbon footprints) would be to hold partnership meetings and consultations using Skype or similar systems.	Noted	No change
GCC	General	Declaration – GCC's entry needs changing to: Lead Commissioner – Strategic Infrastructure (this may change and we will advise accordingly).	Noted	Amend
GCC	3.2.1	Climate Change and Climate Emergency – The reworking of this section is supported and appropriate given the rising recognition of the scale of the problem and the declaration of climate emergencies by a number of organisations.	Noted	No change
GCC	9.1.8 & 9.1.9	the additions/changes are supported. Incremental growth is a significant issue for AONBs and more difficult for local planning authorities to resist so bolstering the management plan will help balance planning decisions.	Noted	No change
GCC	12.2	A Charter for Residents and Visitors – Similarly the strengthening of this section with regard to climate change is welcome and provides further guidance on what people can do to help protect the Wye Valley.	Noted	No change
GCC	8.4	We were highly supportive of the previous iteration of this plan in relation to archaeology, and remain similarly supportive of the revised version.	Noted	No change

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GCC	Glossary	The only comment arises from the fact that this is an update and relates to Sites and Monuments Records (pages 112 and 127), which are now Historic Environment Records (HERs), designed to incorporate information relating to all heritage assets rather than just archaeology. The Historic Environment (Wales) Act 2016 definition is the best available: http://www.legislation.gov.uk/anaw/2016/4/section/35 . Similarly there are references throughout to English Heritage, nearly all of which should now be changed to Historic England.	Noted	Amend
GCC	General	There is some mention of the Glover Report at para 9.1.9 but other references would be useful. This is because if the government accepts some of the recommendation AONBs may have a change of name and emphasis including becoming principal areas for nature (ecological) recovery. Such recovery is however picked up by changes at paras 8.2.7 and 8.2.8 but the challenge of nature recovery is worth being backed up by support from the content of the Glover Report. This is however slightly problematic as the Glover Review covers England only https://www.gov.uk/government/publications/designated-landscapes-national-parks-and-aonbs-2018-review .	Noted, see new paragraph 5.2.7	5.2.7 added.
GCC	7.2.2	We see that the final AONB Management Plan will be subject to any findings of a SEA and HRA which are being undertaken on the plan. It is a shame a draft version of these is not also available for inspection as part of this public consultation. Saying that we can see at para 7.2.2 that the HRA conclusion is no likely significant effects on any European Sites (as for the current plan). We assume that currently this can only be an interim conclusion before the content of the new AONB Management Plan is confirmed?	SEA & HRA conclusions will be incorporated into the final Plan before adoptions.	SEA & HRA conclusions will be incorporated into the final Plan before adoptions.
GCC	1.1.3	Missing from new para 1.1.3 under County/District is the Gloucestershire Waste Core Strategy although during the AONB Plan period this will be reviewed and be renamed a Waste Local Plan.	Noted	Amend
GCC	General	The changes to the section on Climate Change are needed as is reference to the new threat of Ash die-back. References to 'Brexit', Defra's 25 Year Plan, the Agriculture and Environment Bills are welcomed.	Noted	No change
GCC	8.2	Section 8.2 and objective WV-B5 (on nature recovery of priority species in particular) we wondered if the example of pine marten (and possibly beaver) re-introduction should be mentioned? Although only happening in adjoining areas, e.g. Forest of Dean, if successful the species may spread to most of the AONB with largely positive effects occurring for ecosystems. This is best determined by discussion with Forestry Commission / England and the Gloucestershire Wildlife Trust as to what could be said / included in the new AONB Management Plan.	See GWT comment on 2.1.3 and inclusion of Pine Marten as some seem to have settled in the AONB.	Insert to end of 8.2.9 "A good example of this is the managed reintroduction of Pine Marten into the Forest of Dean and their migration into the AONB."
GCC	WV-B2	If strategic objective WV-B2 uses the term key wildlife sites because of	Noted	Delete 'key' also in 2.1.3

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		Gloucestershire then this can be changed to say just local wildlife sites now (due to a name change in January 2020).		& 8.2.2
GCC	11.2	Should perhaps state that due to a quantum of new housing development in surrounding areas the AONB may come under increased recreational pressure although this can be partly offset by provision of green spaces and green infrastructure elsewhere. This may require a modification of strategic objective WV-R4. The role of the AONB in promoting other green space and infrastructure outside the AONB or moving it away from the most sensitive locations needs to be emphasised more in the plan. Some of this could be said also in section 10.2 and especially in 9.1 where we can't see any real reference to the potential impact of increased recreational pressure upon the AONB.	Noted. WV-R4 is focused on avoiding conflict with the AONB Special Qualities & SACs.	Insert at end of 9.1.8 "However, new housing development in surrounding areas may increase recreational and other pressure in the AONB if adequate provision of green infrastructure is not provided locally." Insert to 10.2.1 2 nd sentence "while exacerbating pressures on the AONB." Insert at end of 11.2.2 "The Coronavirus pandemic and consequent travel restrictions, combined with fine weather, led to increased recreational pressure and access to the countryside and the river. Increasing demand for housing and access to the natural environment may intensify recreational pressure in future."
F65B	2.2.1	We believe that public transport, and particularly scheduled bus services, have an important and increasing role to play in the achievement of the Plan's Vision.	Noted	No change
F65B	3.2.5	The Plan refers to "declining public transport services". We do not think this has been the case in the recent past in the Monmouthshire part of the AONB, but even so, a resurgence in public transport is required to meet the range of pressures set out in the Plan. Looking forward, there are a number of reasons why we believe that public transport should feature strongly and positively in the AONB Management Plan.	Noted	No change

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F65B	7.1	We believe that an enhanced public transport offer in the AONB can contribute strongly to each of the "Themes" identified in the Plan.	Noted	No change
F65B	9.4.3	We think that 9.4.3 could be more positively framed. We agree that there can be negative public perceptions influencing people's willingness to use public transport – but these need to be challenged, rather than accepted! There are positive stories to tell. Unfortunately, the evidence is that neither the network nor individual local bus services are currently promoted by either local authorities or the AONB Unit. This is a major omission and could be an easy win. A commitment needs to be made to correct this position if we are to achieve the objective of seeing more passengers making use of buses. Whilst there are businesses and attractions that do not have a regular bus service, there are many along the A466 and the B4293 that do – so it would be good to see some positive examples quoted. It is too easy to slip into negative language about bus services.	It is accepted that there has been less AONB promotion in the last couple of years. It is also recognised that the A466 & B4293 do have good bus services, but other part of the AONB, especially in Herefordshire and Gloucestershire are not so well served.	Amend 7 th & 8 th sentences to read "The AONB Unit, along with the local authorities, have promoted the use of the local bus services and the network throughout the AONB. However, more could be done, especially following the impacts of Coronavirus on local transport."
F65B	9.4.4	Integration of rail, coach and local bus services is a major issue that requires attention. Monmouth recently lost its National Express coach service, but access to the AONB by coach and rail is important to future sustainable transport options.	Noted	Insert in penultimate sentence "bus &"
F65B	9.4.7.	We very much support Strategic Objective WV-T1 and the ambition set out in 9.4.7. We believe that Active Travel combines well with use of public transport and there is merit in viewing the two together.	Noted	No change
F65B	11.	We strongly support Sustainable Tourism Strategic Objectives WVS1, WV-S2 and WV-S4 and Recreation and Access Strategic Objective WV-R1. Public Transport needs a new place at the centre of sustainable tourism as a principal and preferred means of gaining access to tourism and recreation experiences.	Noted	No change
F65B	10.1	We strongly support Community Development Strategic Objectives WV-C1 and WV-C2.	Noted	No change
F65B	11.3	We believe that Scheduled Rural Bus Services can contribute to the delivery of Appreciation and Understanding Strategic Objective WVA1.	Noted	No change
F65B	12.1	We support Partnership, Management and Governance Objectives WV-P1 – P3. We believe that a new initiative to promote and encourage use of public transport is now essential and fits very well with WV-P5.	Noted	No change
F65B	12.2	We support the "Charter for Residents and Visitors" and believe that Friends of the 65 Bus provides a ready example of the charter in action.	Noted	No change
F65B	General	The Monmouthshire part of the AONB is actually reasonably well provided with	Agreed	No change

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		scheduled bus services compared to many other rural counties – principally Routes 65 and 69.		
Resident B	1.1.4	Agree with the rationale for the approach, but consider the ongoing decline in political backing for the AONB mission and the national/English farming policy watershed anticipated from the mid-decade, justify tighter prioritisation of objectives for the next 5 years, so the JAC and the Unit's efforts are concentrated on topics that better the AONB's standing to capitalise on the policy arena after 2025. It seems to me that adding climate mitigation to the range of topics will spread inadequate resources for core AONB matters even more thinly, skimming the surface of too many issues?	Noted, but the Glover Review and wider policy agendas are driving AONBs to broader application.	No change
Resident B	1.2.4	Are these supplementary purposes of 19 years back encompassed in present day policy and relevant to the CROW Act S.85 duty ?	Current policy does not ratify these supplementary purposes. But Glover Review and wider policy agendas in England and Wales do validate broader purposes for AONBs. However there is currently no additional statutory purposes.	No change
Resident B	1.3	A clear and helpful explanation that nationally (via the AONB Association), should be interpreted for the different categories of bodies subject to the CROW Act S85 duty.	Noted	No change
Resident B	2.	If not already in existence, I consider there would be merit in capturing and updating a set of common statistics on assets and quality parameters of the AONB and for the national series of AONBs, as an evidence base to inform AONB policy goals and show trends re asset upkeep or decline. Organisation of data collection by agencies re AONBs is a tangible way of addressing their CROW S.85 duty. Section 2 is peppered with facts and figures that prompt this thought.	The State of the AONB Report contains the relevant data (where available).	No change
Resident B	3.1 and 3.2	This is an excellent summary and a sound rationale for why proactive responses in scale with the trends and issues is imperative if natural beauty is to be secured for society. The generic content would be made more real by contemporary examples (perhaps they sit within the 'State of the AONB' report?). I consider it would be greatly informative to have a public record of 2015-2020 significant actual physical changes, cases under planning control or otherwise, recorded by the AONB Unit. Accompanied	Noted. The State of the AONB Report does contain some evaluation of trend from the relevant data (where available)	No change

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		by your professional evaluation of these cases' likely outcomes for AONB features/special qualities, perhaps using a scoring system e.g. ++, +, neutral, -, --.		
Resident B	3.2.1.7	I'd stress the importance of citing the hedgerow habitat network in all references to connectivity. The appropriate management regimes for hedges' multiple benefits are not practised at the scale required, as annual flailing reaches ever-more corners. This is a land manager education and ecological restoration theme that should be championed by this and other AONBs. (Also 4.2.2) The Elan reference is misplaced here.	Noted	Insert in 1 st sentence after robust habitat networks “, including hedgerows,” Insert to end of 4.2.2 “and hedgerow” Move last sentence to end of 3.2.1.5
Resident B	3.2.1.8	The GI theory is uncontested and expressed through umpteen aspirational policies and strategies going back decades; what is still missing or inadequate are the means for funding GI, both within and beyond AONBs. Does the CIL operate across all the AONB and incorporate GI payments? What other realistic sources of funding can be created e.g. from tourist stays/visits, hypothecated green tax revenues? Can LAs deploy shared staff as GI specialists with a particular focus on AONB delivery, perhaps with shared costs from local business sectors which stand to gain most?	GI is becoming better integrated in planning policy. But broader funding remains opportunities remain elusive.	No change
Resident B	3.2.4	I note the national government has agreed to the area-based farm payment regime for 7 years – this plan's lifetime, but may accelerate reform?	Noted	No change
Resident B	3.3.2	More quantitative samples of this kind, of land use and vegetation change, are important to highlight what is changing and features most at risk. OS Base maps and aerial photography timeline comparisons might be within the scope of subjects for student projects and course dissertations?	Agreed, when opportunities arise.	No change
Resident B	4.	Guiding principles for the plan: Whilst it is valuable to have this comprehensive and up to date text, I feel some easy way of showing how the four AONB principles sit with the laws, policy structures, other agencies' plans etc is needed. Perhaps a simple matrix to show the nature of the overlap and differences for each principle with the above would help convey the degree of integration – in terms of what is 'common business'.	An interesting proposal but beyond the remit and capacity of a light touch review.	No change
Resident B	4.4.7	A tool kit for interpreting these laws, to foster joined-up action, is a necessary step, I consider. The theory is great, but practice needs to build cumulatively towards attaining the AONB vision, and each component of that vision regarding natural resources needs a lasting Wales body figurehead, with the mandate and means.	This is for Welsh Government and beyond the remit of this Plan review.	No change
Resident B	5.5.2	A core budget for the Unit of £300k pa, equates to £917/square kilometre/year (AONB area of 327 square km), illustrating how very little is available from Exchequer/LA resources for the hugely important cause of special landscape upkeep. This will only	The annual turnover of the AONB Unit including partnership	No change

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		<p>change if a strong constituency of support manifests as the slimming back of other public spending areas to switch those funds to AONBs, and/or raising Exchequer/LA income to spend more on AONBs....but where is the debate? Will the JAC foster such?</p> <p>I consider Theme 5 in 7.1.6 is particularly deserving of an enhanced AONB core budget, which would bring about benefits and policy delivery successes far greater than costs.</p> <p>I'd like to see more hard-hitting content re management, such as how the core budget/area ratios compare with the other 45 AONBs – are their league tables? And how this compares with other like protected areas in Europe (a job for Europark Fed'n/AAONB?)</p>	<p>projects can exceed £1M pa. The Glover Review proposed a doubling of AONB resources.</p> <p>It is not the purpose of the Plan to benchmark against other AONBs.</p>	
Resident B	7.1.1	<p>I agree with the retention of the five broad themes, though in 7.1.3 the terms “aims” and “purposes” are used. As the former is much more specific than the latter, should not it be “aims” that are the test of compatible integration? The terms are not interchangeable. If both terms are correct, a cross-reference to the relevant section in Part 1 is suggested.</p>	<p>Accepted that ‘aims’ within ‘Aims’ should be rationalised when referring to AONB purposes.</p>	<p>Amend 7.1.3, 9.2 & 9.3 replacing ‘aims’ with “purposes”</p>
Resident B	7.3	<p>Given the number of strategic objectives and their vintage, I consider the objectives deemed ‘essential’ to progress through prioritised delivery in the 2020-25 period are distinguished from others, to highlight strategic imperatives. Some objectives may be pivotal in this period because of the assessment of cumulative trends and pressures or other plans’ intentions; some objectives will position the AONB in anticipation of a radically-different subsidy model for farm businesses and maybe wider rural land owners/occupiers.</p>	<p>A comprehensive review of the Plan will be undertaken for next Plan cycle</p>	<p>No change</p>
Resident B	8.	<p>Our unique landscape: Again, an excellent summary of the subject which could be employed for popular and accessible literature aimed at target groups for the plan’s objectives, the media etc.</p>	<p>Noted</p>	<p>No change</p>
Resident B	8.6.8 and 8.6.9	<p>Should address planting and the natural expansion by regeneration of hedges, copses, riparian tree strips, woods...if management of adjoining land is relaxed (and subsidy rules don’t run counter!), and by the simple step of modifying hedge cutting practice, to mark and protect saplings to grow to maturity in mechanically flailed hedges.</p>	<p>Noted. Woodland expansion and hedgerow trees are referenced.</p>	<p>No change</p>
Resident B	9.	<p>Development and transport: This strong section also reads well and could be drawn upon for wider communication and education purposes such as briefings for Parish Councils and amenity bodies, to encourage their informed engagement with decision-makers.</p>	<p>Noted</p>	<p>No change</p>
Resident B	9.1.9	<p>I’d strongly concur with the last sentence for this AONB specifically and all AONBs in general. I’d suggest that the staff or contracted out resources for approved development monitoring, development control enforcement, TPOs and Hedgerow</p>	<p>Noted. However, the resource implications for LPAs may</p>	<p>No change</p>

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		Regulations administration is worthy of a higher priority and better resourcing and tailoring for AONB purposes. Could the JAC promote the case for LAs to collectively up their game and prioritise geographically in this regard, bettering their core budgets for this vital work and deploying them to further AONB objectives? Pragmatically, there may be value in exploring a rotating enhanced service role between LAs across FYs, so that an elevated monitoring and enforcement scrutiny is implemented in each LA area in turn? Sampling programmes for significant case audits at intervals is another option. Giving this topic the status of a strategic objective in its own right could galvanise backing.	constrain adoption of the Plan. Certainly resources do not exist to adequately achieve this currently.	
Resident B	12.1	Add a comment on any consequences of the Glover report re governance recommendations?	Accepted.	Add to end of 21.1.4 "There are governance proposals in the Glover Review which would augment these recommendation if enacted in England."
Resident B	12.1.5	I don't accept that the environment should inevitably have the last call on governments' spending choices and a proper democracy would engender public debate on relative spend across themes. That apart, the logic is sound, though ever-broader partnerships that result in multiple small outcomes, ticking boxes for all partners but of little lasting consequence for the key AONB conservation issues is not serving the public interest, now or future.	Acknowledged, but that is not the meaning of this paragraph.	No change
Resident B	WV-P1 to WV-P9	These 9 objectives are key to AONB success and should be audited to inform the next plan iteration. For that they need genuine targets e.g. a target for P2 for a level of government funding, re P4 – the named 'make a difference' organisations for compliance in the next 5 years.	Noted. The AONB Partnership Annual Business Plan and AONB Unit Action Plan are used to monitor these Objectives. An audit and comprehensive review of the Plan will be undertaken for next Plan cycle	No change
Resident B	12.2	The charter for residents and visitors: I really like the charter! It should be accessed by all land, business and home owners, distributed with a map, alongside mainstream communications from 'have regard' bodies such as the RPA for farm subsidies, and the LAs re Council Tax and Business Rate collection.	Noted	No change

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Resident B	13	<p>Monitoring and Metrics: This subject is always covered in strategic plans and governance process, and in my experience, is nearly always marginalised and forgotten or quietly dropped. Rarely is the use of such data revealed re policy or other applications. The initiative is highly welcome if it measures meaningful outcomes which convince funders like Defra and the WG to give AONB units the resources they need – feedback on effectiveness or lack of, for future iterations should be in the public domain. The indicators skip over measures of rebuffs and failures of AONB objectives, and these need to be captured somewhere as a reality check.</p> <p>But with the Unit's shrinking capacity and the wider acute constraints on tracking and reporting environmental outcomes, will any of it be locally applied unless a lead responsibility is carved out – even a quarter post? My suggestion is that the AONBs collectively agree which will lead on the different metrics, to road test and evaluate costed working procedures that can be applied nationally, sub-regionally etc.</p> <p>Theme 5 is weakest. Counting appraisals is a process measure of engagement work load, but outcome measures re actual influence of unit advice are far more important e.g. unit appraisals which had 'no, little, some, significant positive effect' re AONB objectives. Theme 6 is vital. Are volunteer categories and time costed in the same way across England and Wales?</p>	These are the nationally agreed metrics with NAAONB and DEFRA for English AONBs. Procedures for Welsh AONBs are different.	No change
Woodland Trust	General	We welcome the Plan and its Vision, which overall sets a strong direction for nature recovery and climate resilience in the AONB. We welcome that the Plan is framed around a changing climate and the need to not 'fossilise the landscape' but rather best manage adaptation and change of a living landscape.	Noted	No change
Woodland Trust	3.2.1.2	We note that a climate emergency has been declared by the local authorities in the AONB, and the AONB itself through the Colchester Declaration (reflected at 8.2.7). The Colchester Declaration commits AONBs cumulatively to 36,000 ha of woodland creation. We note there is no explicit creation target in this Plan and, notwithstanding the importance of care in planning for the right tree in the right place (reflected in the principles at 8.6.8), we welcome working with the AONB on a sound woodland expansion plan appropriate to the special qualities of the Wye Valley.	Noted	No change
Woodland Trust	3.2.1.7	line 2, after 'movement of' insert 'some' or 'mobile'	Accepted	Amend
Woodland Trust	3.2.1.8	line 6, after 'Restoring' insert 'and managing'	Accepted	Amend
Woodland Trust	3.2.4	line 15, amend 'covered' to 'even-aged'. This is because 'continuous cover' forestry refers to systems that also involve creating canopy gaps to encourage natural regeneration or permit planting, such as the 'group-selection' system recommended by	Accepted	Amend

Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2020-2025
 Response to Public Consultation Draft comments (closed 21st January 2020)

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		George Peterken in 'Woodland Development – A Long-term Study of Lady Park Wood', 2017, CABI.		
Woodland Trust	3.2.4	Forestry, cont (p.14) line 1, after 'timber' insert 'and wildlife with ancient and veteran trees managed sympathetically throughout.' lines 7-8, amend 'Sycamore and other species' to 'other species including sycamore'	Accepted	Amend
Woodland Trust	4.	GUIDING PRINCIPLES FOR THE PLAN We welcome the guiding principles for the Plan as sustainable development, natural resource management, the ecosystem approach and the landscape approach. Taken in combination, these lead to smarter management and decision making that enables a sustainable, resilient and thriving AONB.	Noted	No change
Woodland Trust	Table 8 SQ2	Woodlands: An additional threat to woodlands is ammonia pollution and the impacts of nitrogen deposition on woods and trees.	Accepted	Insert under Changes or threats: "Pollution, especially ammonia and impacts of nitrogen deposition on woods and trees"
Woodland Trust	Table 8 SQ18	Amend 'Ancient trees' to 'Ancient and veteran trees' for clarity and better cross over with local authority local plans (per NPPF para 175c).	Accepted	Amend
Woodland Trust	Table 9	Activities & Pressures in the Wye Valley AONB We suggest that threats from pollution are more clearly linked to polluting activities. Although these are captured in the latter 'Pollution' section it would help to more clearly relate them to key source activities to better target action.	Noted	See below
Woodland Trust	Table 9	inclusion as a negative impact under 'Agriculture', e.g. 'Impact of run-off of pollutants associated with certain forms of agriculture on the ecological health of the wider catchment'.	Accepted	Insert under Negative Impacts "• pollutants and run-off degrade the ecological health of the wider catchment"
Woodland Trust	Table 9	An additional negative impact under 'Housing & the built environment' is destruction of habitat and potential impact on the integrity of wider ecological networks and hydrological function (extent dependent on scale).	Accepted	Insert under Negative Impacts "• destruction of habitat and disruption to the integrity of wider ecological networks and hydrological function (extent dependent on scale)."
Woodland	Table 9	An additional negative impact under 'Transport & Traffic' is disturbance to wildlife	Accepted	Amend

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Trust		and potential severance of ecological corridors, especially on new or increasingly used roads.		
Woodland Trust	7.1.2	We suggest removing 'where necessary' and 'where appropriate' so that the aims simply read 'conserving and enhancing' and 'to conserve and enhance'. This language as it stands could unintentionally limit ambition by stakeholders.	Accepted	Amend
Woodland Trust	7.1.2	We welcome the explicit aim that reflects the importance of wooded habitats in the AONB: 'to ensure woodlands and trees throughout the Wye Valley AONB are managed sustainably in a way that protects and enhances the outstanding ancient woodland character of the area, and provides economic, environmental and social benefits'.	Noted	No change
Woodland Trust	7.1.5	We welcome this theme but suggest there is greater emphasis on inclusivity. Inclusive access to the natural environment is a key issue highlighted by the Glover Review. An additional aim might read, 'Championing inclusivity, all groups are actively welcomed, especially those who have historically been underrepresented in the AONB's visitors'.	Noted. However, this is covered in more detail in the section 11 and WV-R4	No change
Woodland Trust	8.	AONB Aim: we suggest amending the biodiversity aim to read, 'Conserve, enhance and restore the biodiversity of the AONB <i>through</i> robust ecological networks.	Accepted	Amend
Woodland Trust	WV-H2	We welcome that ancient trees are included, which helps emphasise that ancient trees are part of heritage.	Noted	No change
Woodland Trust	8.5	We note there is no mention of agroforestry in this section. We would welcome promotion of agroforestry principles and practices, which while not new are increasingly pertinent in the context of ecological degradation and a changing climate, and as agriculture has intensified and become more disaggregated from forestry. The benefits of trees in farming systems are wide ranging and include tree crops for human and animal consumption, shelter for animal welfare, healthier soils, better water management and wood products. The recently published Agroforestry Handbook which explores the detail of practical management might be a useful resource.	Noted.	Add to end of 8.5.5 "Adoption of agroforestry may restore some historic wood-pasture landscapes and bring more trees into cropland."
Woodland Trust	8.6.2	lines 4-5, update (<i>Chalara fraxinea</i>) to '(<i>Hymenoscyphus fraxineus</i>)' and italicize all other scientific names. N.B. Ash dieback is still called <i>Chalara</i> but the causal agent is now accepted as <i>Hymenoscyphus fraxineus</i> rather than <i>Chalara fraxinea</i>	Accepted	Amend
Woodland Trust	8.6.2	line 5, amend '(<i>Phytophthora cambivora</i> x <i>fragariae</i>)' to '(<i>Phytophthora cambivora alni</i>)'	Accepted	Amend
Woodland Trust	8.6.2	line 6, amend to 'having an effect' and 'some dramatically' i.e. insert a word space.	Accepted	Amend
Woodland Trust	8.6.2	line 11, expand from 'species diversification ...' to 'species and genetic diversification [is very much at the core of woodland adaptation and ensuring resilience in the future]'. A recent evidence review implies that genetic diversity might be more	Accepted	Amend

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		important than species diversity in building resilience, which highlights the importance of natural regeneration.		
Woodland Trust	8.6.2	We would endorse the statement that future woodland resilience to existential threats is best mitigated by species diversity and the 'genetic churn' of native species rather than the importation of 'new' species deemed to be better suited to a changing climate.	Noted	No change
Woodland Trust	8.6.2	line 13-14, amend to 'However their gene pool and extensive connectivity ...'	Accepted	Amend
Woodland Trust	8.6.2	line 15, amend to 'adaptation and/or migration.'	Accepted	Amend
Woodland Trust	8.6.3	line 6, after 'once more.' Insert: 'Fluctuating economics will continue to have a variable impact on levels of management as will the level and type of any state aid.'	Accepted	Amend
Woodland Trust	8.6.3	line 7, amend 'and' to 'though'	Accepted	Amend
Woodland Trust	8.6.4	We note there is no mention of the role of species reintroductions in pest control. We suggest that the recent pine martin reintroduction is highlighted here as an example of innovative, joined-up thinking to achieve better balance of species numbers by working with nature.	Accepted	Insert to end of penultimate sentence "although the recent pine martin reintroduction may help achieve a better balance."
Woodland Trust	8.6.7	line 4, after 'existing sites' insert: 'Multi-purpose management must still be over-archingly influenced by the need for ecological sustainability, resilience and expansion.'	Accepted	Amend
Woodland Trust	8.6.7	line 7, after 'and' insert 'other'	Accepted	Amend
Woodland Trust	8.6.7	line 9, after 'management' insert: 'to improve surface viscosity' and replace the comma with a colon, i.e. 'management to improve surface viscosity: woodland owners ...'	Accepted	Amend
Woodland Trust	8.6.7	line 13, after 'remnants', insert: 'continuous cover forestry (CCF) principles should be the preferred mechanism wherever practicable.' Then start a new sentence: 'It is good ...'	Accepted	Amend
Woodland Trust	8.6.7	line 14, after 'in one go.' Insert: 'Bringing former coppice woodland back into management should also be done carefully and gradually; overstood coppice stems are wont to blow over with potentially disastrous results for the stool, if too rapidly exposed. A phased and cyclical approach should be adopted where re-coppicing is an appropriate. In some circumstances, encouraging owners to manage glades, gaps and internal edges may be more appropriate, letting some of the former coppice areas	Accepted	Amend

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		return to irregular, mixed species high forest.'		
Woodland Trust	8.6.7	line 14-19, replace passage beginning with 'Where replanting' with: 'Heritage features and 'hot-spots' of ancient woodland remnants (including ancient and veteran trees) need to be protected during all forestry operations. Natural regeneration of new trees should be encouraged wherever possible from the rich gene pool of the Wye Valley woodlands, but where replanting (or direct seeding) is necessary 'the right tree in the right place for the right purpose' must be encouraged. Planting stock should be native species of local provenance that have been sourced and grown in the UK and should also be of local origin. This is to foster local character, phenological relationships with other species and also to reduce the risk of importing further pests and diseases.'	Accepted	Amend
Woodland Trust	8.6.8	line 1, replace 'tree planting' with 'woodland creation' to allow for both natural regeneration and planting. Expand to: 'A key tool in the response to the climate emergency is woodland creation - not only for its carbon storage potential but also in building resilience to the impacts of a changing climate'.	Accepted	Amend
Woodland Trust	8.6.8	line 8, amend to: 'considerable amount of natural regeneration and/or tree planting	Accepted	Amend
Woodland Trust	8.6.9	line 3, after 'especially' insert: 'ancient and veteran trees which are an especially scarce ecological niche and resource.'	Accepted	Amend
Woodland Trust	8.6.9	line 8, after 'cultural history.' Insert: 'They are generally of a delicate disposition requiring adequate protection in forest, woodland and hedge operations. Interference should be minimal including that of the roots, to minimise shock. Attempts should not be made to 're-pollard' lapsed pollards as this is often terminal. Arboricultural and preferably Ancient Tree Forum expertise should be referred to as often as possible. An active programme of identifying potential 'new' ancient and veteran trees should be undertaken to fill the generation gap for decaying heartwood and its associated specialists.'	Accepted	Amend
Woodland Trust	8.6.9	line, 10, amend to: 'A seed collection, propagation and planting programme ...'	Accepted	Amend
Woodland Trust	8.6.9	We would further welcome inclusion of explicit ash dieback management principles, such as: only felling where there is a material safety risk; a commitment to replace where trees are removed; and to replace through natural regeneration, or where planted, from native stock of local provenance that has been sourced and grown in the UK (per above). Gloucestershire Local Nature Partnership has recently released its Ash Dieback Position Statement: https://www.gloucestershirenature.org.uk/forum/nature-recovery/ash-dieback-position-statement . Cotswold AONB has undertaken work to identify the most appropriate replacement species for their area; we would recommend	Accepted	Insert before penultimate sentence "Good practice management principles for ash dieback should be followed, including only felling where there is a material safety risk; a commitment to replace

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		a similar approach in the Wye Valley. The Devon Ash Dieback Resilience Forum is a good example of localised action in response to ash dieback, including advice to farmers.		where trees are removed and to replace through natural regeneration, or where planted, from native stock of local provenance that has been sourced and grown in the UK.
Woodland Trust	Woodland. Trees and Forestry Strategic Objectives	We suggest an additional strategic objective: WV-W6 Support the recording, management and awareness raising of ancient and veteran trees, including a programme of identifying potential 'new' ancient and veteran trees to fill the generation gap for decaying heartwood and its associated specialist species. Please add 'W6' to references elsewhere in the plan to ·W1·, ·W2·, ·W4· and –W5	This is a proposed project for the Action Plan. Ancient & Veteran Trees are a Special Quality with such initiatives supported by WV-B3, WV-H2, WV-W2 & WV-5.	No change
Woodland Trust	10.2.1	We welcome the acknowledgement of the importance of businesses taking a natural capital approach to their decision making. Not only does this lead to more responsible stewardship of the natural environment, it can also unlock important new investment for nature recovery.	Noted	No change
Coleford TC	General	The Council was pleased to see that many of the points in our response to the review submission of December 2018 have been addressed in this Draft. Coleford has links to 11 Special Qualities (2,4,5,8,9,11,13,14,16,18,20) relevant to LMZ10 (Dean Edge Limestone Hills) which is situated in our Parish. However we also relate to the whole AONB, especially as Coleford hosts the Tourism Information Centre (TIC) for the Forest of Dean administrative area. We are in support of continuing with the five themes as you have done, based on the previous Review.	Noted	No change
Coleford TC	WV-L1, WV-L2	In the Coleford Neighbourhood Development Plan (CNDP) which was made in 2018, there are numerous policies which pertain to this unique landscape. Both the policies and the Appendices are relevant and used in our comments made to FoDDC on planning applications. The CNDP can be found at www.colefordtownplan.com	Noted	No change
Coleford TC	WV-L3	This is very pertinent to CNDP, where the Landscape Character has been included and policies such as CNE1, CNE2 and CNE3 are now part of the made plan and applied appropriately. See also Bells Field Landscape Character, where the AONB is mentioned, in Appendix N.	Noted	No change
Coleford TC	WV-L4	This is important for AONB to do, so that we can keep our Plan updated.	Noted	No change

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Coleford TC	WV-L5	Tourism is a vital part of rural sustainability and Coleford TIC prioritises the promotion of public awareness, appreciation and experience of the Wye Valley and Forest AONB. Key to this is the manner of making the AONB available, but in a sustainable way.	Noted	No change
Coleford TC	WV-B1 to WV-B6	All supported. See detail in CNE1 and CNE3, Map 14 and their application in planning commentaries.	Noted	No change
Coleford TC	WV-G1 to WV-G4	All supported, and there are opportunities to develop this locally with routes as part of Coleford Area Walking Festival, and potentially Coleford Walkers are Welcome (application in process).	Noted	No change
Coleford TC	WV-H1 to WV-H3	This is particularly important where there is such strong local identity, especially based in the previous mining and infrastructure. We note SQ16.	Noted	No change
Coleford TC	WV-F1 to F7	Agree with these	Noted	No change
Coleford TC	WV-W1 to W5	As part of our five year plan for this Council, we are considering related initiatives, and would welcome expertise to develop them appropriately. This could be through a useful workshop. Strategies will need to be compatible with Forestry England's Forest Of Dean Management Plan, currently in process.	Noted	No change
Coleford TC	WV-D1 to D5	We note the use of CNDP policies in tune with these to sustain our landscape character and maintain appropriate development. This is relevant both within the AONB boundary and in close proximity, ie within its setting. We have our existing NDP, which is annually monitored and will be reviewed as appropriate.	Noted	No change
Coleford TC	WV-M1 to M3	As our AONB area has significant quarrying in and around it, we are very aware of their planning applications and the Mineral Plan. Comments are regularly made. It is important to have AONB data and strategy to utilise.	Noted	No change
Coleford TC	WV-U1 to U4	all supported.	Noted	No change
Coleford TC	WV-T1	Given the absence of rail transport and poor public bus transport locally, and the relationship with the Welsh boundary, it would be very advantageous to gain a network of shorter linkages into the larger scale transport net. This would enable residents and visitors to use that transport sustainably, rather than encourage greater number of car journeys. A system like the Dales bus should be investigated. The Council would wish to be involved in such discussion. The use of public transport is also part of the aims for Walkers are Welcome.	Noted	No change
Coleford TC	WVT2 to T3	supported	Noted	No change
Coleford TC	WV-C1	This is what Coleford is doing, reviewing and taking forward at a smaller scale. The	Noted	No change

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		CNDP was developed in that manner.		
Coleford TC	WV-C2 to C4	all supported.	Noted	No change
Coleford TC	WV-E1 to E4	all supported.	Noted	No change
Coleford TC	WV-S1 to S4	Whilst in general agreement, it is difficult to “spread demand and balance pressures”. Forestry England in its developing Management Plan for the Forest of Dean is investigating keeping some very valuable bio areas difficult for the general public to access, for preservation reasons and for quiet tourism. Hotspots will be part of that strategy. TICs will be asked where known hotspots are, and training should be provided for volunteers. This will increase confidence and enable them to give appropriate advice.	Noted	No change
Coleford TC	WV-R1	agree, and Coleford is working to extend cycle and footpaths to increase access.	Noted	No change
Coleford TC	WV-R2	Irresponsible use of mountain and off road bikes, motorbikes on and near footpaths is becoming an issue which affects the landscape character and the use by others.	Noted	No change
Coleford TC	WV-R3 to R4	all supported and important to work on if Coleford is to succeed in gaining Walkers are Welcome status. Coleford will then fill in the geographical gap between Chepstow, Ross and Monmouth.	Noted	No change
Coleford TC	WV-A1	supported.	Noted	No change
Coleford TC	WV-P1 to P9	all supported.	Noted	No change
Coleford TC	12.2	Coleford Town Council five year development plan has climate change as a key element. Many of the actions in the “Charter for Residents and Visitors” are relevant.	Noted	No change
HC	8.2.1 and 8.2.2.	I recommend that these paragraphs are amended so that the water quality issue relates to the SAC designation and also refers to point source pollution (as in table 9 Activities and pressures page 67). It would also be helpful to include a link to the Nutrient Management Plan dashboard : https://environment.maps.arcgis.com/apps/Cascade/index.html?appid=1dc5b2adc99e48b095950055f2785d7a If you would like any further background information on the NMP please contact James Bisset or Kevin Singleton.	Noted	In 8.2.2 insert “& SAC” when referencing SSSIs Amend 4 th sentence to read “The moderate ecological status is largely due to diffuse inputs from agriculture and point source sewerage (see the Nutrient Management Plan dashboard)”.
HC	9.2.4	In the minerals section it would be helpful to include reference to minerals local plans being prepared by the minerals planning authorities. Information on the emerging Herefordshire Minerals and Waste Local Plan can be found here:	Accepted	Amend

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		https://www.herefordshire.gov.uk/info/200185/local_plan/280/minerals_and_waste_local_plan Pre-submission consultation is expected in late summer.		
HE	General	As the Government's adviser on the historic environment Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account within the Management Plan. The light touch approach to the review of the previous Management Plan is acknowledged, and our comments relate to the proposed revisions in respect of the historic environment.	Noted	No change
HE	1.1.2	The revisions to the purpose of the plan, in terms of the Plan being 'place based', are welcomed	Noted	No change
HE	1.3.4	The references to sense of place and cultural heritage are supported	Noted	No change
HE	3.3	With regard to changes since designation, interrogation of Historic Landscape Characterisation (HLC) data may be able to help inform the analysis of changes in the landscape during this time. We note that HLC is referred to in Para 6.2. There is the potential for links with past, present and future project work at Offa's Dyke to inform considerations of changes since designation. We note that the heritage asset is referenced later in Section 14 of the Plan (P.53);	Noted	No change
HE	5.2.4	The reference to English Heritage should be revised to Historic England for the avoidance of doubt	Accepted	Amend
HE	8.4	The revisions to the overall Historic Environment section are welcomed. It is considered that the Historic Environment Strategic Objectives are still relevant.	Noted	No change
HE	13	The new section on Monitoring and Metrics is welcomed.	Noted	No change
HE	General	The references to the Government's 25 Year Environment Plan throughout the document are welcomed since it provides for links between the natural and historic environments which are key to the Wye Valley AONB and its management.	Noted	No change
HWT	General	We approve of the Plan as it recognises and addresses the key threats to the most important species and habitats found in the Wye Valley AONB. The Plan also proposes and supports an array of opportunities to conserve and enhance biodiversity.	Noted	No change
HWT	3.2.1.6, 3.2.1.8 & 3.2.4	The role of habitats and sustainable land management to sequester carbon is mentioned only briefly in the document. Given the strict targets being imposed to achieve carbon neutrality (in Herefordshire the target is now just 10 years away), it is likely that carbon sequestration will be a key part of the solution potentially impacting on management practices and land uses and associated landscape and wildlife. We believe acknowledgement of this could be increased in the Plan, particularly sections 3.2.1.6, 3.2.1.8 & 3.2.4.	Accepted. 3.2.1.8 references 'ecosystem service' which include Carbon sequestration.	Insert in in 3.2.1.6 after 'improving' "carbon sequestration," Insert in 3.2.4 after 'reduced emissions' "and increased carbon sequestration"
HWT	3.3.3	Significant increases in deer numbers are putting unsustainable pressure on woodlands. This should be included in the list of changes since the AONB was	Accepted	Amend

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		designated.		
HWT	Table 8	Existing fragmentation should be recognised as a threat in the Biodiversity Theme in the Table of Special Qualities. There is reference to further habitat loss being a threat (to Woodlands only), but this infers that better management of existing habitats will be enough to achieve the conservation and enhancement of biodiversity and further declines will be avoided. In truth, in many parts of the AONB (particularly in Herefordshire) it is likely the landscape is already too fragmented to prevent further biodiversity losses even if all existing habitats were brought into favourable condition. The Lawton principles propose that there should be 'more' and 'bigger' good quality habitat for wildlife to flourish.	Accepted	Insert under Condition for SQ2 & SQ4 "some sites fragmented/isolated"
HWT	Table 8 SQ4	Inappropriate tree planting is not mentioned as a threat to Species Rich Grassland in the table of Special Qualities (although it is raised in section 8.6.8) and we believe it should be. We suspect that grassland habitats with low agricultural productivity could be the preferred option for tree planting as pressure for woodland creation increases putting this habitat at an enhanced risk.	Accepted	Amend
HWT	8.2.9	This section refers to the AONB Partnership helping to deliver 'well-functioning ecosystems delivering nature based solutions with multiple benefits for people and wildlife'. We welcome this approach as it is an area of focus for many conservation bodies across the UK including the Wildlife Trust's. Examples include the recent reintroductions of Pine Martens and Beaver into the natural environment (including the Wye Valley AONB), both have the potential to deliver nature based solutions such as pest control and natural flood management. However, there is little to find in the Biodiversity Strategic Objectives to support such delivery of nature based solutions. We believe the pro-active pursuit of nature based solutions should have specific reference within the Strategic Objectives and go further than protecting existing natural processes to accommodate and adapt to climate and other environmental change.	Accepted	Insert to end of WV-B3 to read "including through nature based solutions and landscape scale habitat connectivity".
HWT	9.1	Development: In the Environment Bill, currently at the Committee stage in parliament, proposes a requirement for biodiversity net gain of 10% for developers through the planning system. This has the potential to make substantial changes to both biodiversity enhancement, green infrastructure and future development within the AONB. We believe that this important piece of legislation should be recognised within the Management Plan, preferably within the Development Strategic Objectives	Accepted	Insert to end of 9.1.6 "In England Biodiversity Net Gain has the potential to make substantial changes to both biodiversity enhancement and green infrastructure."
NRW	General	NRW welcomes the broad alignment of the draft Plan with the policy objective of Sustainable Management of Natural Resources in Wales, namely to maintain and enhance the resilience of ecosystems and the benefits (ecosystem services) they	Noted	No change

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		provide. Implementation of the Plan will also deliver the priorities of the Natural Resources Policy, the realisation of which also drives Area Statements. It is helpful that the Wye Valley AONB has engaged successfully with the landscape approach of the emerging South East Area Statement. These Statements will evolve, and it is anticipated that they will support collaborative approaches to improve ecosystem resilience and associated benefits across Wales.		
NRW	General	The plan references Sustainable Drainage Plans (SUDs), Planning Policy Guidance (PPG) note 25 and the need to consider flood risk at a catchment scale. In its undertaking of flood risk management (FRM) measures on 'main rivers', NRW will seek to appropriately engage with the Wye Valley AONB at an early stage during project development relating to new flood alleviation schemes. Appropriate engagement will also be sought with regards to any significant changes to its maintenance programme where deemed relevant to the interests of the Wye Valley AONB. A similar approach will be followed by those responsible for the Lower Wye Internal Drainage District.	Noted	No change
NRW	General	NRW is looking at how it can both deliver and support delivery by others, of catchment approaches using nature-based solutions (natural flood management (NFM) / working with natural processes) to enhance the future resilience of catchments and ecosystems. It is seeking to embed NFM within its operations with such as hybrid capital schemes, and a process by which it can provide technical advice, data and evidence to support wider catchment management approaches. Capital funding is being made available for the delivery of small-scale natural flood management projects. These projects aim to deliver a range of environmental benefits including habitat creation, biodiversity improvement, carbon sequestration and flood risk. Where any such projects are being considered to be sited within or adjacent to the AONB, we will seek early engagement with the AONB.	Noted	No change
NRW	General	Within the Monmouthshire PSB Well-Being Plan, NRW has an action for "Improving the resilience of ecosystems by working at a larger scale (landscape) to manage biodiversity and maximise benefits such as natural flood risk management". We acknowledge the need to work collaboratively with key partners within Monmouthshire to achieve this objective. We are currently in the process of commissioning a consultant to review the work of PSB partners and other key stakeholders. Wye Valley AONB are seen as a key partner in delivering this outcome and we would welcome your involvement in the review and in any future partnership work.	Noted	No change
NRW	General	Most Welsh floodplains are managed for intensive agriculture. However, restoration of more natural processes and more sustainable management of floodplains could provide	Noted	No change

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		<p>multiple benefits to society whilst also promoting national targets and policies for biodiversity maintenance and enhancement. Habitat restoration/creation on floodplains can lead to enhanced delivery of a number of ecosystem services, such as flood-risk alleviation, pollution control and soil carbon storage.</p> <p>NRW have commissioned an investigation of the restoration potential of Welsh floodplains, looking mainly at grassland habitats and including an opportunity mapping exercise focused on the Wye catchment. The final report of the project will be available shortly and may be of interest. All data produced as part of the project will be available from NRW and via the Lle Geo-Portal for Wales http://lle.gov.wales/home.</p>		
NRW	5.4.8	<p>Reference is made to the Wye Catchment Partnership. The Partnership is currently made up of 129 organisations and stakeholders covering the sectors of agriculture, forestry, tourism, recreation, mining, business, water companies, statutory bodies and both local and national government. It acts as a portal for numerous other groups and works with the Local Nature Partnerships. The partnership demonstrates what can be achieved by thinking long term, taking an integrated approach (considering economic, social, environmental and cultural outcomes), collaborating and involving others in finding sustainable solutions.</p> <ul style="list-style-type: none"> • The priority river basin management issues to tackle in this catchment are phosphate, poor soil management (leading to excessive overland flow/sediment loss to water) and loss of biodiversity. As a result, NRW are focussing on the Wye in central Monmouthshire as an Opportunity Catchment in 2020. 	Noted	No change
NRW	8.6	<p>The contribution that Welsh Government Woodland Estate (WGWE) makes to the special qualities of the AONB is undeniable. NRW is a strong advocate of the sustainable management of woodlands and trees, and our aspirations for the parts of the Wye Valley woodlands that we manage are very similar to those of the Wye AONB.</p> <ul style="list-style-type: none"> • NRW is very keen on the sustainable multipurpose management of the Wye Valley woodlands and would be very keen to be involved in sharing and providing advice to woodland owners. • Following organisational design, NRW has a new structure which has been designed to enable a place-based approach to deliver shared objectives effectively. NRW share a desire with the AONB to work closely in the future and would welcome the opportunity to discuss how we might do this, especially in the context of the Woodland, Trees and Forestry Objectives. • The management of wildlife, particularly wild boar, deer and squirrels has been and still is a challenge that could thwart the objective that the AONB is trying to achieve. 	Noted	No change

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		The new place-based approach will help, but NRW, the AONB, and other woodland managers either side of the border will have to work together to control wildlife to achieve our common objectives.		
NRW	8.2.2	<p>'NRW have a duty to report on the condition of SSSIs and whether they are in favourable condition'</p> <ul style="list-style-type: none"> The terrestrial ecologists within the South East - Environmental Assessment and Advice Team are currently involved with the Baseline Evaluation Project which is aiming to provide an indicative condition assessment of the habitats and species features of the protected sites series (SSSI's, SAC's, SPA's) across Wales. This data will be made available to the Wye Valley AONB once it is finalised which we expect to be in December 2020. The results should also help support the AONB's strategic biodiversity objectives outlined on page 73. 	Noted	No change
NRW	2.1.3	The wording of the sentence "Underlying this are 46 Sites of Special Scientific Interest (SSSIs) including 4 National Nature Reserves (NNRs) and 204 County local/key wildlife sites" is a bit confusing as it could relate to the SACs mentioned in the previous sentences. It might be helpful to change 'this' to 'the AONB' so that it is clear where the supporting sites are located.	Accepted	Delete 'Underlying this...' replace with "Across the AONB there..."
NRW	3.2.1.7	With reference to River Wye water flow, compensation releases are also made from the Elan Valley Reservoirs in order to protect the aquatic environment.	Accepted	Amend
NRW	3.2.4	Forestry – the Chalara sentence "The diversity of the Wye Valley woodlands means the forest cover will continue but Sycamore and other species will replace the Ash, changing the nature of the woodlands" is a bit of a bold statement as we are not sure if Ash could make a comeback over time. Certainly, in the near future this is likely to be true and it may be worth stating that with the current prominence of ash in woodlands and hedgerows in the Wye Valley area, that the landscape character will change, with many dead or dying trees visible for many years before they are replaced.	Noted. Landscape impacts are referred to in the previous sentence, and elsewhere, eg 8.6.2 & 8.6.8,	Amend 8.1.4 to read "There will be significant change to the landscape in the long term from climate change and diseases such as Ash Dieback."
NRW	8.2.8	The reference to diversity of Sorbus species could include the two species that are confined to the AONB – namely Sorbus parviloba (Ship Rock Whitebeam) and Sorbus ementiformis (Doward Whitebeam) – see Rich et al, 2010 – BSBI Handbook No 14 – Whitebeams, Rowans and service Trees of Britain and Ireland.	Accepted	Amend
NRW	8.3	Geodiversity – we noticed that there is no mention of the Geological Conservation Review (GCR), which identifies those sites that underpin the SSSI series and which includes Otter Hole GCR in the lower reaches of the Wye Valley. GCR could also need adding to the acronym list Appendix 2.	Accepted	Amend
NRW	8.6.9	As in our comment 3.2.4 above, it might be worth emphasising the impact the loss (either through death and decay or targeted felling of trees for H&S reasons or commercial felling ahead of trees succumbing to the disease) significant numbers of	Accepted	Insert to end of sentence 'The impact of Chalara Ash Dieback is...', "

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		ash trees would have on the landscape.		resulting in potentially noticeable change in landscape and/or woodland character in places".
Resident C	1.2.2	Hyphenate 'Breath-taking'	Accepted	Amend
Resident C	3.3.3	Reference to 'Symonds Yat' is this East or West or both	Includes East, West and Yat Rock.	No change
Resident C	4.4.5	'Lie' should be "lies" Delete 'that are be used'	Accepted	Amend
Resident C	5.4.5	Capital A for 1949 Act	Accepted	Amend
Resident C	Table 8 SQ22	Under 'Recognition' replace 'No formal cataloguing and assessment' with "Routes with public access for MPVs recently mapped online by the TRF at www.greenroadmap.org.uk and by the GLASS at www.trailwise2.co.uk " - so they may be conserved for everyone to enjoy.	Noted. But this is only a partial cataloguing of the resource.	Asterisk reference and place under 'Extent'.
Resident C	Table 9 Horse riding	What does 'traffic free' mean? Traffic is anything that moves, so by definition a horse rider is not allowed on a "traffic-free" route. Do they mind horse-drawn carriages? Or would they be terrified to meet one [on a Restricted Byway]? Where are these traffic-free routes? Answer - bridleways and forest tracks and access to private land. Best put: ".. motor traffic free ...	Accepted	Amend
Resident C	Table 9 Horse riding	'Local spend of horse-riders' Where do most spend this money in the AONB? 99% of riding is people who live in AONB and everything they buy for their horse (apart from say renting a field or buying hay locally) will come from outside.	As suggested there is some spend in the AONB.	No change
Resident C	Table 9 4x4 etc.	'trial' should be "trail" "Off-tarmac" does not mean much. Unfair to put this - most activities have an illegal element. See other comment about 'non road-legal vehicles and/or non road-legal drivers/riders'	Accepted	Amend
Resident C	Table 9 4x4 etc.	Pressures: 1 st bullet 'unclassified public roads': most are classified; replace with "public unsealed County Roads" 2 nd bullet: suggest add "by non road-legal vehicles and/or non road-legal drivers/riders"	Accepted	Amend
Resident C	Table 9 4x4 etc.	Negative Impacts: 'Can exacerbate erosion to path...' replace 'path' with "route"	Accepted	Amend
Resident C	11.2.2	Replace 'motorbike' with "motorcycle"	Accepted	Amend

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 Response to Public Consultation Draft comments (closed 21st January 2020)

Organisation / Name	Paragraph / Policy	Respondent's comment, change or addition	Response	Recommendation
		PRoW - suggest now instead: "some CR-F and CR-B, Byways Open to All Traffic and public unsealed County Roads."		
Resident C	Appendix 2	please insert "GLASS : Green Lane Association"	Accepted	Amend
Resident C	Appendix 2	LHA Local highways authority – Is this used? HA is in common use. Suggest search document text, alter and delete. So will have HA Highway Authority & HA Highways Agency	Noted	Delete LHA
Resident C	Appendix 2	Please add in: "MPV : Mechanically Propelled Vehicle"	Accepted	Amend
Resident C	Appendix 3 Glossary	County Road: Replace 'local highways authority' with "the Highway Authority (usually the County Council's Highways department)"	Accepted	Amend
Resident C	Appendix 3 Glossary	Local Access Forum: replace 'Countryside Agency' with "Natural England"	Accepted	Amend
Resident C	Appendix 3 Glossary	Please add another item: "Mechanically Propelled Vehicle : A vehicle propelled 'mechanically' - generally other than by human or animal. Includes electric cars, vans, etc but not low-powered vehicles such as electric cycles."	Accepted	Amend
Resident C	Appendix 3 Glossary	Public Right of Way: replace 'wheeled' with "horse-drawn (non mechanically propelled) vehicles or"	Accepted	Amend
Resident C	Appendix 3 Glossary	Quiet Lane: date of Transport Act not clear.	Noted	Amend to 2000
Resident C	Appendix 3 Glossary	Rights of Way Improvement Plans: insert acronym (ROWIP) and in Appendix 2. Insert "Rights of Way and other access" before 'in their areas'	Accepted	Amend