

**HOWARDIAN HILLS
AREA OF OUTSTANDING NATURAL BEAUTY
JOINT ADVISORY COMMITTEE
22 NOVEMBER 2018**

AONB MANAGEMENT PLAN REVIEW

1.0 PURPOSE OF REPORT

- 1.1 To receive details of the progress of the AONB Management Plan review to date and the next steps.

2.0 PROGRESS TO DATE

- 2.1 In accordance with the revised Programme attached as Appendix 1, initial work was completed during April and May to revise the text of the individual topic chapters, and to compile updated statistics for the 'State of the AONB' report. Scoping of the Strategic Environmental Assessment and Habitats Regulations Assessments was also carried out.
- 2.2 The updated draft chapters were sent to the Topic Group stakeholders, with a request for comments and also asking for an indication of whether they felt that a formal Topic Group meeting was required. A number of useful comments were received back and although several one-to-one meetings were held no-one requested a full Topic Group meeting.
- 2.3 The comments received were incorporated into the text of the draft chapters as appropriate and the remainder of the Plan (Landscape Management & Priority Sites section, State of the AONB document, Action Plan, etc) were revised and the documents then prepared for public and stakeholder consultation.
- 2.4 The formal consultation was launched on 28th September, with all the consultation documents posted to the AONB website. Notification letters were sent to approximately 150 local stakeholder organisations, including Parish Councils and local schools, and a flier was sent to approximately 250 farmers and land managers within the AONB. An email alert was also sent to all the Topic Group members, to ensure that no-one was missed. An article on the Management Plan review was also included in the AONB News, which was delivered to 10,300 addresses within and near the AONB in late October.
- 2.5 The consultation closed on 11th November and 16 responses were received. A basic selection of the main points raised, together with some indicative draft responses, is included as Appendix 2. The full schedule of the detailed comments will be emailed to Members prior to the meeting.

3.0 NEXT STEPS

- 3.1 Following discussion at the JAC, the full table of comments and proposed changes to the draft Plan will be circulated to the JAC and Core Partners Group for final observations.
- 3.2 The full schedule will then be sent to Natural England, as required by their guidance, in early December.
- 3.3 The revisions will be incorporated into the Plan during late December and early January, and the final Plan then be formally signed-off by the JAC Chairman.

- 3.4 The Plan will be sent to the three constituent Local Authorities on 18th January 2019, in time for formal adoption by 31st March 2019.
- 3.5 On 29th March the text-only version of the revised Plan will be published on the AONB website and also sent to Defra.
- 3.6 The formal designed versions of the Management Plan and accompanying documents will be produced between March and August, and then posted to the AONB website. A very limited number of printed copies (c.50) will be produced, for the JAC and AONB Team to use on a day-to-day basis.

4.0 RECOMMENDATION

That the progress and next steps detailed above be noted for information.

MAIN ISSUES ARISING FROM CONSULTATION COMMENTS

	<u>ISSUE</u>	<u>AMEND THE PLAN?</u>
1.	The recognition for the potential role of enabling development is noted, and given the significance of the Castle Howard Mausoleum in particular, which is prominent in views across the AONB, does this site deserve a specific mention?	<p align="center">No</p> (Site already has a Priority Site reference number, against which future work/aspirations can be recorded in due course)
2.	Sorry to see the Plan is even longer than the 2014-2019 Plan: principally Chapter 1.1 'Policy & Legal Framework of AONBs' and this may be required of all AONB plans (do query what value it's added)	<p align="center">No</p> (All AONBs are inserting this and it provides useful legal background not published anywhere else in HHAONB literature)
3.	No mention of Holiday Homes – Threat and / or good for Tourism?	<p align="center">Probably not</p> (Although there are some holiday homes the issue isn't as bad as in other National Parks or AONBs)
4.	Development proposals that could harm the current economy of the AONB based primarily upon agriculture and tourism should not be supported. Refined to: Encourage development that supports and enhances the local economy based on agriculture and tourism.	<p align="center">No</p> (The suggestion is considered to be too restrictive, particularly given the likely increase in farm/rural diversification linked to Brexit. Other Objectives adequately cover the issues around wind turbines, new buildings, etc.)
5.	The Natural Capital diagram and HHAONB Natural Capital Asset table require headings/labels to explain their presence here.	<p align="center">Yes</p> (Also insert useful definitions of Natural Capital and the Natural Capital Approach into p29)
6.	A64 (Objective RTT5). Request rewording of this to read "Support proposals for improvement of the A64 Trunk Road through the AONB, subject to these being fully justified and sensitive..." This would better reflect the General Principle set out on p54.	<p align="center">Yes</p> (The wording of the General Principle was updated but not the wording of the Objective)
7.	Are only 10-20ha of woodland felled per year in the AONB? As Hovingham often do 10ha a year there can't be much other felling going on. I therefore don't think this is accurate and it might be worth consulting the Forestry Commission.	<p align="center">Yes</p> (The Forestry Commission have checked one-off Felling Licences and 10-year Plans and feel that 20-30ha would be more accurate)

8.	2.4.3 General Principles bullet point 6: PAWS restoration, p53. The words 'where appropriate' should be added to the end of this paragraph. PAWS sites can be managed sympathetically under conifers, dependent upon the management regime.	Yes? (Need to ensure that references to PAWS restoration throughout the document are consistent)
9.	2.4.4: last bullet point page 58. You will not get Local Needs housing unless it is economically worthwhile for the owner of the land. I would therefore suggest removing the word 'limited' in the last line.	Yes (change to: "... only likely to be facilitated through the associated provision of market housing")
10.	2.5.1 – There are many miles of permitted footpaths in the AONB and these should be recognised in bullet point 3	Yes (Add to text)
11.	Consideration could be given to protecting important concentrations of mature hedgerow trees using TPOs.	No (This could be pursued, if applicable, under Action NE2.2 - protecting the best sites via designation)
12.	PLACE is concerned about the erosion of roadside verges by large-width vehicles and parking. These verges contain unimproved habitat and rare flora. Where popular footpaths commence, defined parking spaces or lay-bys should be created in order to stop parking on, and resultant erosion of, the verges.	No (Formal lay-bys would require surfacing, which would be expensive and have a suburbanising effect. It would also completely destroy areas of verge and prevent any future regeneration of flora if parking was subsequently restricted using other methods)
13.	PLACE recommends that the 17 identified geological sites are both protected and kept free from over-growth of foliage. The JAC should work closely with the following: - The District Councils on the Yorkshire Wolds who are progressing an application for a UNESCO Geoparks Status. The Jurassic Corallian strata in the Howardian Hills AONB are of equal importance. - The British Geological Survey, to establish the geological character and importance of each of the 17 sites. - The JAC or AONB Unit to produce either a booklet on the geology of the AONB or pamphlets on significant sites.	No (Objective NE7 covers this. It is intended to produce a booklet, but this has needed to wait for the results of the survey)
13.	<i>Under the heading Regulating soil erosion, the last sentence says, 'The problem can be regulated through appropriate land management practices'. It may be useful to the reader to provide an example of a type of</i>	Yes (Add examples)

	practice which may be considered to be appropriate.	
14.	I would suggest amending the wording to DRE4 to say, 'Support appropriate mineral-working and energy fuel extraction proposals which.....'	No (Shale is a mineral so is covered by the catch-all phrase)
15.	Potential future challenges within the AONB Non-hydraulic fracturing - Currently the Government is seeking views on the principle of whether non-hydraulic fracturing shale gas exploration development should be granted planning permission through a permitted development right. Although the outcome of this formal consultation process is not known at this stage, it may be useful for the final AONB Management Plan to include a new reference to non-hydraulic fracturing as well as hydraulic fracturing.	Yes (Amend wording to cover all possibilities)
16.	Glossary section Would suggest including definitions on hydraulic (and non-hydraulic) fracturing in the glossary section.	No/Yes (These definitions vary between policy documents and it wouldn't be appropriate to include a definition here. Include definitions of conventional and unconventional hydrocarbons)
17.	It would be useful in the text to identify in which local authority boundary each priority site is located or group the site by authority.	No (Sites are arranged by Landscape Character Zone, which are cross-boundary)
18.	Is 'well-managed' the right term? Sympathetically managed/appropriately managed? In some instances the most suitable management might be no management/minimal intervention? Are there any areas of the AONB which would lend themselves to re-wilding?	
19.	With the potential changes on the cards for farming post-Brexit and the likelihood that land managers will be paid for public services, is the description of 'rolling agricultural fields' likely to conjure up a slightly different image to the changes that may take place? I don't know if 'rolling farmland' works any better?	No? (This appears to conflate the term 'agricultural' with 'arable')
20.	Bullet 5: it would be great to have an opportunity map to accompany this statement and show the areas of habitat that are a priority for expansion, buffering and connection (perhaps in phases, e.g. to 2024 and then to 2035?)	Yes (No mapping exercise undertaken, but can add as an Action for this Plan period)

21.	Natural Environment objectives: in the vision it states that; 'Priority Habitats within the AONB will have been expanded, buffered and linked via a more diverse landscape, to form a coherent network of green infrastructure that is resilient to climate change impacts, however there are no objectives which specifically reference/address this? The objectives are largely around protecting what exists which is laudable, but not around expanding, buffering and linking.	No (Actions NE3.1 to 3.5 have exactly this hierarchy)
22.	Agricultural objectives: as 'hedgerow removal was significant in some parts of the AONB should there be an objective to target that area (is it mapped – if so insert map) for hedgerow creation and restoration? Could some of the AONB grant pot be put toward this?	No (Already included in the Landscape Management & Priority Sites document. See AG2.2)
23.	Disappointing that the wording around hydraulic fracturing isn't stronger and indicative of opposition/how it might conflict with other aims and objectives? Surely the AONB would be looking to avoid this at all costs as it is supportive of more sustainable means of energy generation?	No (Plan needs to be compatible with national and local minerals planning legislation and policy)
24.	Should encourage landowners to keep informal car parks open. Some have been lost in the life of the existing plan, notably the free car park by the Great Lake at Castle Howard.	No (We have no control over this)
25.	Twitter presence is fairly minimal and yet this is a great way to raise the profile of the AONB. More resource could be put into developing the social media presence.	No
26.	The brand/logo could use a redesign to help build a strong brand for the area. It is currently a couple of lines, which doesn't really convey the character of the area. Likewise, does the AONB have a strapline to convey its uniqueness?	No
27.	Condition Indicators – need to include far more Indicators on Biodiversity, e.g. bird, butterfly and flora numbers and trends	No (Data is not available, and the Indicators are about the AONB as a whole, not just biodiversity)
28.	This is a worthwhile and useful document. It could be strengthened even more by including some of the previously mentioned indicators. Is it possible to provide status data such as 'decreasing/no change/increasing' rather than just 'present' for farmland birds? Similarly for invasive species – is there any other data that	No (The NE chapter indicates that data for the AONB is sparse so the objective for this Plan period is to get better knowledge)

	could be presented to show whether these species are expanding (either in population or distribution terms)?	
29.	The Vision is there, with a number of high level aims however these are not referenced in the Action Plan, so it is difficult to see how they are going to be achieved. This links to some of the points made about how some stuff in the vision will be delivered.	No (Disagree - much of it is already there but doesn't appear to have been read by the author)
30.	We suggest a section is added in the plan and report which captures the strength of the voluntary and community sector. This would bring in the many charity and other groups providing valuable voluntary and contracted services supporting people, helping to maintain the physical landscape and supporting access to cultural and heritage resources.	Yes (Add bullet point in Key Facts section of LC chapter)
31.	Recognition of the need for supporting the expansion of broadband needs a greater emphasis, for both living and working, supporting business start-up and growth	Check (Current wording is believed to be a good balance between objectives)
32.	The development of Community-led housing and support for these initiatives requires mention here or elsewhere in the plan. Ryedale District Council is working with Community First Yorkshire to increase awareness and take-up in parishes and market towns of community housing as a means of ensuring people have access to affordable housing.	Yes? (Amend text to include reference to community-led housing)
33.	Couldn't see much about woodland creation and it would be good to flag this as an opportunity to help increase the natural capital of the area through well designed UKFS compliant woodlands. The can also play a role in increasing the resilience on existing woodlands and supporting the delivery of the 25YEP.	Yes (Check and amend text and Objective in relation to new tree planting)
34.	It is considered that the recognition of social media to promote the AONB is essential in the current age. Reference to Twitter accounts is encouraging, however, CPRE North Yorkshire believe that more could be achieved by the use of other similar technologies which would target a wider audience, including Instagram and Facebook to name a few.	No

35.	CPRE North Yorkshire welcomes the opportunity to comment on this Management Plan review and would welcome the opportunity for further involvement – they are members of the JAC for the Nidderdale AONB. In a similar vein, it is considered that wider collaboration should be sought with other key stakeholders in the vicinity including the National Trust and the NPA and District Councils within the area	<p style="text-align: center;">No</p> <p style="text-align: center;">(All these organisations are extensively listed in the Action Programme, whilst the Plan is a Statutory Plan for the District Councils)</p>
36.	CPRE North Yorkshire believe that the reference to ‘requires tight control’ on pg. 54 should be removed as this implies that this activity is considered to be suitable for an area which (alongside National Parks) is afforded the highest protection for its unique landscape in terms of planning policy. It is believed that a reference to the Major Development Test would be more suitable within the Management Plan and the need for any applicant for such development to prove that it meets this important test set out clearly	<p style="text-align: center;">Check</p> <p style="text-align: center;">(Plan needs to be compatible with national and local minerals planning legislation and policy. Not all development covered by this Objective (e.g. small scale extraction of building stone, would be Major Development)</p>
37.	We consider the Management Plan, in terms of policy setting, weak in some areas. In particular the AONB is a Statutory Consultee as well as a management body. FFR consider that there should be a statement outlining the role of the AONB to influence and shape National and Regional policy in the management plan to ensure the rationale for the existence of the AONB is reinforced wherever possible, and at as high a level as possible.	<p style="text-align: center;">No</p> <p style="text-align: center;">(We aren’t a Statutory Consultee in the planning process. Statement to this effect included, as well as in Objective DRE1.1)</p>
38.	Mr Justice Holgate has determined that national guidance is exactly that - ‘guidance’, and that planning authorities are not compelled to follow such guidance if they have a plan that is more appropriate for their area of jurisdiction and proper justification for such a plan has been provided and accepted by the plan examiner. FFR’s understanding is that the Draft North Yorkshire Minerals and Waste Joint Plan should stand with little change subsequent to this legal case.	<p style="text-align: center;">No</p>
39.	The document may wish to refer to the existing fluvial and pluvial risk in some conurbations within the AONB area, and look at targeting land management/natural flood management at locations that also give mutual wider flood risk benefits to locations within the AONB boundary. <i>FW5 - Increased tree planting and establishment of new woodland could be delivered in locations which give the most</i>	<p style="text-align: center;">Yes</p> <p style="text-align: center;">(Check and amend text and Objective in relation to new tree planting)</p>

	<i>positive flood benefits</i> - includes positive reference to the promotion of the Derwent Catchment Partnership and Ryevitalise as vehicles for achieving multi-beneficial environmental ambitions in the AONB.	
40.	The Plan could recognise that necessary proportionate improvements to the highway network in order that the network can accommodate the development can be achieved through developer-funded works. Whilst it is appreciated that the scale of development in the AONB is relatively minor, proportionate improvements giving wider benefits could be achieved to some of the issues cited (narrow roads/rat-running) in appropriate locations and it could be an aspiration that development seeks to proportionately address some of the rural access issues in the villages, giving other economic growth benefits.	Check (Allowing developments in villages and seeking road improvements via developer contributions may be at odds with other 'conserve and enhance' objectives)
41.	Section 2.3.1 Natural Environment makes repeated reference to 'Biodiversity Action Plan' habitats. The UK Biodiversity Action Plan was effectively mothballed in 2011 and is rarely referenced in policy nowadays. The same habitats are recognised as being of Principal Importance for the conservation of biodiversity under Section 41 of the Natural Environment & Rural Communities Act 2006, though admittedly this isn't a very snappy term. It might be better to refer to 'Priority Habitats'.	Yes (Check and update wording in this section)
42.	In the same section, data on habitats is derived from a 1992 survey. This is fairly fundamental to the Management Plan but highlights how old the evidence base is. There will, almost certainly, have been significant changes over the past quarter of a century, particularly in terms of grassland management. This might suggest a need to update the evidence base on the natural environment of the AONB.	No (The data issue is identified in the Natural Environment Key Issues section and Action NE1.4)
43.	The draft wording of the Management Plan regarding minerals planning was considered by Planning Services, in June 2018, prior to the formal consultation. The wording in the Management Plan regarding minerals and waste planning matters is acceptable as items such as the General Principle bullet point relating to minerals extraction and the text regarding Objective DRE4 reflect the outcome of that discussion. The inclusion of waste reduction in the 5th bullet point within Key Issues 2019-2024 is supported. Therefore, there does not appear to be a conflict between	No

	the management plan, and the County Council's minerals or waste planning policy as compatibility with the AONB is already a factor within the work on the Minerals and Waste Joint Plan.	
44.	Natural England considers that the Plan meets the statutory requirement. That the constituent local authorities for the Howardian Hills AONB and wider project area have, by acting jointly, produced a plan that formulates their policy for their AONB and for the carrying out of their functions in relation to it.	No
45.	<p>We consider that the Plan has broadly followed the guidance contained in CA23 and CA221 and therefore represents a comprehensive strategy for the management of the AONB. The AONB Plan also represents good practice in the following areas:</p> <ul style="list-style-type: none"> • The use of the landscape character assessment as a strong evidence base for the Plan and the clear demonstration of the hierarchy of assessments. • Recognition of the National Character Area profiles and associated Statements of Environmental Opportunity. • The highlighting of natural capital and ecosystems services. • Recognition and policies that will allow actions towards the delivery of the Biodiversity 2020 targets. 	No
46.	<p>Although the Plan is well constructed and comprehensive, Natural England feels that it could be made even stronger by further consideration of the following during implementation of this Plan and production of the next:</p> <ul style="list-style-type: none"> • Adding strength to select objectives by ensuring all are suitably prescriptive ensuring all the targets are measurable and specific. • Whilst we recognise the progress being made towards identifying the natural capital within the AONB, it is recommended that the next step should be focused on determining the stocks of natural capital both in terms of quantity and quality suggested in the objectives of the section. Subsequent steps should seek to understand implications of intervention and inform future management to enhance the natural 	<p>Yes (Check all Objectives and Actions to ensure that they are as measurable as possible. Improve the text in NCES1 and NCES2 to reflect the points made)</p>

	<p>capital assets and maintain a sustainable supply of ecosystem services/benefits. We recognise this is an ongoing process rather than a new start.</p>	
47.	<p>Natural England welcomes the Habitats Regulations Assessment Draft Screening Report (September 2018) which we consider to be clear and detailed. Natural England concurs with the assessment that the plan is not necessary for the management of any designated European sites and agrees with the conclusion of no likely significant effects either alone or in combination as a result of the proposed plan review.</p>	No
48.	<p>Natural England agrees with the conclusions of the assessment, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), there are unlikely to be significant environmental effects from the proposed plan review.</p>	No
49.	<p>In conclusion, Natural England recognises that the production of this final draft represents the culmination of many months of intensive work on the part of the Howardian Hills AONB Partnership and particularly the staff unit. We recognise the investment of time and welcome the significant contribution the review makes to ensuring that 15 per cent of the land area of England is under the protection of a statutory AONB management plan.</p> <p>We look forward to receiving copies of your published plan and to working with you and the AONB partnership during its implementation, review and monitoring stages</p>	No

November 2018