

HOWARDIAN HILLS AONB MANAGEMENT PLAN 2019-24

CONSULTATION DRAFT

SCHEDULE OF COMMENTS AND PROPOSED CHANGES

N.B. Deletions are ~~scored through~~, additions are underlined.

RESPONDENT AND REF.	SUMMARY OF COMMENTS	PAGE/ OBJECTIVE	PLAN TO BE AMENDED?	ACTION
AONB Unit				
5.0.1	Typographical errors.		Yes	Amend as necessary.
5.0.2	Factual errors.		Yes	Amend as necessary.
5.0.3	Poor grammar and/or contradictory text.		Yes	Amend as necessary, as long as the meaning of the text is not changed.
5.0.4	Formatting changes/irregular capitalisation.		Yes	Amend as necessary, to ensure consistency.
5.0.5	Insertion of missing data/statistics.		Yes	Add data/statistics in any places where it is missing, and update any statistics where more recent information has become available.
5.0.6	Cross-referencing, to aid navigation between sections.		Yes	Add/amend cross-references as necessary, to assist users to navigate around the Plan. In particular, ensure that all General Principles within each chapter are covered by either an Objective or a cross-reference.
5.0.7	Insert Foreword.	Page 2	Yes	Insert supplied Foreword from Lord Gardiner, with signature and photo.
5.0.8	The fifth Key Vision Aim mentions Priority Habitats but not Priority Species.	Page 28	Yes	Amend text to read: "Areas of Priority Habitats <u>and populations of Priority Species</u> within the AONB..."

5.0.9	Paragraph/references to the Brexit process, including associated processes such as the Agriculture Bill, EU Implementation Period, Agricultural Transition period, etc	Pp 37, 42, 50, 54, 72/73	Yes	Update the Plan to reflect the latest position as close to 18 <sup>th</sup> January as possible. Make references as 'non-specific' as is practicable, inserting " <u>at the time of writing (January 2019)</u> " and indicating that Annual Action Programme targets will be responsive to developments in the process of events.
5.0.10	The candidate LGS sites have not progressed through the system as quickly as was hoped, so the text needs amending.	Page 36	Yes	Amend the text to read: "Following evaluation by the North Yorkshire Local Geological Sites Panel, 16 sites have been <del>ratified by</del> <u>notified to</u> Ryedale District Council." Insert the appropriate number following the Local Geological Sites Panel meeting on 15 <sup>th</sup> January 2019.
5.0.11	The bullet point about the legal status of the AONB Partnership needs some minor amendment to make it clearer.	Page 58	Yes	Amend bullet point to read: "In legal terms, the AONB Management Plan outlines the policies of North Yorkshire, Hambleton and Ryedale Councils as they relate to the AONB. <del>and</del> <u>The</u> AONB Partnership is part of North Yorkshire County Council; <u>it</u> works to influence national and local legislation, regulations, planning policy and planning decisions and has a critical role to play within the planning system."
5.0.12	FW2.1 is not really a progression on from FW1.2. Should UKFS be changed to UKWAS?	FW2.1, p.89	Yes	Amend text of Action FW2.1 to read: "Encourage owners and managers to <u>prepare FC-approved Woodland Management Plans for</u> <del>manage</del> their woodlands. <del>in accordance with the updated UK Forestry Standard 2017.</del> "
5.0.13	Action MN2.1 needs to include reference to SINCS and LGS as well as non-designated sites.	Page 99	Yes	Amend Action MN2.1 to read: "Develop a robust mechanism for assessing the Condition of the <u>locally designated and</u> non-designated Priority Sites identified in the Management Plan."
5.0.14	Priority Sites: <ul style="list-style-type: none"> <li>A few of the Priority Sites entries have an incomplete description of the site features and/or suggested management action. This makes it difficult to work out the connection</li> </ul>		Yes	Amend text for specified sites to read: [Site 2.14] " <u>Improve understanding of features in woodland, initially</u> through a management plan for Newburgh Priory park (see below). Reduce impact of

between site condition and suggested action, or what the desired condition is.

forestry and encourage more sympathetic management. ~~and improve understanding of features in woodland, initially through a management plan for Newburgh Priory park (see below).~~”

[Site 1.11] “... Significant gorse management carried out 2009 & 2017. Ensure retention of native broadleaved woodland and maintain balance between different habitat types. Encourage continuation of existing management agreement...”

[Site 1.19] “... semi-improved neutral grassland and scrub on a steep bank. Maintain balance between different habitat types. Encourage sympathetic management ~~to safeguard interest.~~”

[Site 1.20] “An area of fen, unimproved ~~marshy~~ grassland and scrub with a varied flora. ... Continue scrub ~~control~~ and habitat management to maintain balance between different habitat types. Encourage continuation of management agreement (AONB) ~~to safeguard interest.~~”

[Site 1.21] “An area of rank fen grassland, scrub and marshy flushes. Re-fenced ~~in~~ 2002 and grazed by Exmoor ponies until 2012. Maintain balance between different habitat types. Encourage new management agreement ~~to safeguard interest.~~”

[Site 1.36] “Unimproved and semi-improved calcareous grassland on an old quarry site, ~~owned by a local conservation charity.~~ Invading scrub...”

[Site 1.38] “...within an area of scrub. Rabbit fenced 1998 and cut annually rotationally. Greater knapweed planted...”

[Site 1.86] “...significant stratigraphic exposure of the Corallian limestone. Monitor condition. Associated limekilns...”

[Site 1.43] “Species-rich unimproved calcareous grassland ~~pasture~~ on a steep hillside...”

[Site 1.44] “A calcareous ash woodland ~~on an escarpment,~~ parts of which have ...”

	<ul style="list-style-type: none"> <li>• There is some inconsistent formatting with regard to recording the details of previous work carried out on Sites.</li> <li>• Many of the Site descriptions use the wording “to safeguard interest” in relation to the management prescriptions. This is considered to be unnecessary duplication/repetition.</li> <li>• Coulton Mill has been added to the national Listed Buildings at Risk Register.</li> </ul>			<p>[Site 1.46] “Fenced 2004 to allow introduction of conservation grazing. <u>Maintain balance between different habitat types.</u> Encourage continuation...”</p> <p>[Site 1.47] “Two areas of calcareous fen <u>and scrub</u>, abandoned as arable land 1985.... Scrub managed 2017. <u>Maintain balance between different habitat types.</u> Encourage continuation of ...”</p> <p>[Site 1.49] “A <u>water body and</u> wetland of ornithological interest...”</p> <p>[Site 2.67] “...Low/Not at Risk. <u>Monitor condition.</u> Encourage continuation of sympathetic management agreement (ELS + HLS) <del>to safeguard interest.</del> <u>Monitor condition.</u>”</p> <p>[Site 1.66] “...Scrub control carried out 2006. Rush control carried out 2009 <u>&amp; 2018.</u> Encourage continuation...”</p> <p>[Site 2.91] “...prehistoric enclosures and field systems. Seek to improve condition <del>in</del> <u>within</u> an agricultural regime.”</p> <p>[Site 1.74] “An area of neutral and marshy grassland <u>and scrub</u> adjoining the Jeffry Bog and River Derwent SSSIs. <u>Encourage grazing and management of scrub.</u> Encourage continuation of existing management agreement (ELS + HLS) <del>to safeguard interest.</del>”</p> <p>Yes Amend text that reads “<del>in</del> 20xx”.</p> <p>Yes Delete the words “<del>to safeguard interest</del>” throughout the Site descriptions text, where this is felt to be duplication/repetition.</p> <p>Yes Add Coulton Mill as Site 2.111 to the Priority Sites section in Zone 6. Consult the latest Historic England LB@R Register and cross-check against the sites included in the Plan.</p>
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5.0.15	<ul style="list-style-type: none"> <li>Full survey information isn't available for one of the candidate Local Geological Sites, so it can't be taken forward at this stage.</li> </ul> <p>The SEA and HRA documents need to be updated with any revised wording for Objectives and Actions, and these then need to be re-evaluated to ensure that the Screening Reports are still reaching accurate and appropriate conclusions. In particular the revised wording for Objective RTT5 (A64 improvement) needs careful scrutiny.</p>		Yes	Delete Site 1.92 from the Plan and re-number the remaining LGS accordingly.
Cllr Christine Cookman 5.1.1	The "State" of the AONB report and repeated elsewhere: is "State" accepted wording?	Page 3	No	This title is used by the majority of AONBs and reflects that the document is a compilation of the latest available statistics relating to the AONB.
5.1.2	1.1 – is the chapter necessary?	Page 4	No	This text has been prepared by the NAAONB for potential inclusion in all AONB Management Plans. It provides a useful summary, in one place, of the legislative development of the AONB designation. This summary isn't available in any other document produced by the Howardian Hills AONB and the Management Plan is felt to be the logical document in which to lay it out. It is a particularly useful section in relation to development management.
5.1.3	2nd para. "some " and "some" – change one or omit?	Page 4	Yes	Amend to read "... contribute <del>some</del> <u>approximately</u> £16bn every year to the national economy."
5.1.4	3rd column "The 1949..... Act" – wording/phrasing not quite right.	Page 4	Yes	Amend wording to read "...National Parks and Access to the Countryside Act <del>first</del> established the AONB designation,..."

5.1.5	3rd column, final sentence: not sure Crayke Castle in its current state is a good example of country house / landscape.	Page 12	Yes	Amend wording to read: “ <u>The</u> Castle Howard, Newburgh Priory, ... are on Historic England’s Register of Parks & Gardens, and other notable examples include Hovingham Hall <u>and</u> Whitwell Hall <del>and Crayke Castle.</del> ”
5.1.6	1st para, final sentence – “...early churches, with churchyards”. Wording?	Page 13	Yes	Delete comma and amend wording to read “... early churches <del>with</del> <u>and</u> churchyards.”
5.1.7	2nd column final para.....”Have Regard to”.....	Page 13	Yes	Amend text to read: “... Duty to <del>Have</del> <u>have</u> Regard to...”
5.1.8	New listed building? Number change from 373 to 374;  Query SINCs decrease from 70 to 66.  Also Page 31 2nd column top para quotes 70.	Page 18; page 31   Page 31	No  No  Yes	The data on the number of Listed Buildings in the AONB is provided by Historic England. It is not known which specific buildings may have been added or deleted. Since the Plan was last printed in 2014, two SINCs have been amalgamated into one much larger one, whilst it was also discovered that three of the sites included in 2014 were not actually SINCs. This text is a direct quote from the NCA 29 Area Description, but it should be corrected to read: “There are <del>70</del> <u>66</u> locally designated Sites of Importance...”
5.1.9	Bottom line - Typo – Candidate...(cLGS)	Page 18	Yes	All the candidate sites have been ratified so this text is now superfluous.
5.1.10	1st column, 2d para. Mid-way down, ‘Estates’ with capital ‘E ‘or not? - occurs throughout.	Page 21	Yes	Where the reference is to a particular body, e.g. the Castle Howard Estate, an upper case E should be used. In all other contexts it should be lower case.
5.1.11	2nd column, midway.... ‘important during the next Management Plan...’ or should it read ...’the current Plan’	Page 21	Yes	Amend wording to read: “during <u>this</u> <del>the next</del> Management Plan period, ...”
5.1.12	2nd column, 1st & 2nd bullet pts. .... are these transport ‘visions’ realistic?!	Page 28	No	The Vision is for the year 2035, which is 15 years away. Significant changes have happened in the past 15 years as regards on-line access to public services, so it’s felt that these Aims are still valid ones to work towards.

5.1.13	2nd column – delete 2nd bullet pt. – but maintain sentence(s).	Page 31	Yes	This is a formatting error – retain text but not as a bullet point.
5.1.14	3rd column - include managed tree work /woodland cover?	Page 31	Yes	Amend text to read: “... the need for irrigation respectively), <u>increased carbon storage</u> , reduced soil erosion and improved water quality. <u>Similar benefits could also be achieved from increased tree and woodland planting, in targeted locations where this would also conserve and/or enhance landscape character.</u> ”
5.1.15	3rd column re woodland – query Ancient & Ancient Semi-Natural increase from last Plan?	Page 35	No	The figures are provided by the Forestry Commission. It’s assumed that any discrepancy/change is due to changes in mapping methodology and/or their database.
5.1.16	3rd column re Rivers & streams – comparison to England’s figures doesn’t tally?	Page 35	Yes	Amend text to read: “... in comparison to 17% of England’s rivers and streams <u>and 53% of its groundwater bodies.</u> ”
5.1.17	3rd column, final bullet pt. Is this true?	Page 37; Action NE1.4, page 81	Yes	Amend text to read: “The <del>lack</del> <u>relative scarcity</u> of widespread and up-to-date habitat and species extent, <del>and</del> <u>quality and abundance</u> data...” Amend NE1.4 to read: “Gain a better understanding of the <del>trends in</del> Priority <u>Habitat</u> <del>habitat</del> area and <u>Priority Species</u> <del>species</del> populations <u>in the AONB, and their trends.</u> ”
5.1.18	No mention of fracking? But included in Objectives (this point may apply elsewhere too).	Page 46	No	Fracking is noted in the bullet point as an issue that is frequently raised by residents.
5.1.19	No mention of Holiday Homes – threat and / or good for Tourism?	Page 46	Yes	Include in the list of issues raised by communities. Amend text to read: “...poor broadband connectivity, <u>second homes/holiday cottages</u> , plastic recycling, ...”
5.1.20	2nd column, final bullet pt. include the size of HGVs & agric. vehicles? Waste reduction?	Page 46	Yes	Include in the list of issues raised by communities. Amend text to read: “...volume of traffic (particularly HGVs), speeding traffic, <u>the size of HGVs and agricultural machinery using narrow roads</u> , dog fouling, ... poor broadband connectivity, second homes/holiday cottages, <u>waste reduction</u> , plastic recycling, ...”

5.1.21	2nd column – decrease in pigs mentioned – has there been an increase of sheep?	Page 49	Yes	There has been a 24% increase in sheep numbers, as shown on p.20 of the State of the AONB Report. Amend text to read: “...arable cropping, with associated sheep and cattle enterprises. <u>The area of arable cropping has increased by 12%, and the number of sheep and lambs by 24%, over the last five years.</u> There are a small number of poultry farms ...”
5.1.22	3rd column, top bullet point, check figures re Entry Level-type Stewardship land compared to last Plan.	Page 49	No	The Entry and Higher Level Stewardship Scheme has changed to Mid-Tier and Higher Tier Stewardship since the publication of the last Management Plan. The number of farmers (and hence percentage of the AONB area) within ELS has therefore declined significantly (as land comes out of Agreement). Changes in Scheme design and restrictions on funding have meant that farmers formerly in ELS have not been able to enter Mid-Tier Stewardship, so this figure has not increased commensurately.
5.1.23	1st column, 2nd bullet point - can ancient woodland increase - 47% from 46%	Page 52	No	The figures are provided by the Forestry Commission. It’s assumed that any discrepancy/change is due to changes in mapping methodology and/or their database.
5.1.24	2nd col. 3rd bullet - Any Japanese knotweed? Which may or may not be dreaded.	Page 54	No	There are several small patches of Japanese knotweed in the AONB, which are being monitored, but their scale and extent isn’t as significant as the other species mentioned and isn’t felt to warrant inclusion in the list.
5.1.25	2nd col. 1st bullet – hadn’t realised there was alternative funding for roads....	Page 61	No	Noted.
5.1.26	Some omissions – NYGP, NYMNPA, NYNET	Page 79	Yes	Agreed. The missing organisations are in the Word document but not the printed document. Check across between the Action Programme and list of organisations to ensure that they are all included.

5.1.27	Page 80 onwards – assume there will be lines between the Action points, delivery etc.	Page 80 onwards		Noted. The table contains lines separating the Objectives and this is felt to be the appropriate density of dividing lines.
G. Wilson 5.2	In section 2.4.4 I would suggest under ‘General principles’ an additional bullet point as follows: Development proposals that could harm the current economy of the AONB based primarily upon agriculture and tourism should not be supported. It therefore seemed to me that a general clause making the point that not all economic benefit is necessarily appropriate or quite as beneficial as it appears might be useful to you.	Page 58	No	Noted. It is felt that the proposed bullet point would be too restrictive in policy terms, and incompatible with LPA Local Plan policies. This next Plan period is likely to see significant re-structuring of agricultural businesses following Brexit, with farmers exploring various diversification options. It is felt that any planning applications coming forward can be adequately controlled via both the general and subject-specific policies in the Development & Rural Economy section, e.g. in relation to renewable energy installations, holiday lodges, etc.
Ryedale District Council 5.3.1	The new introductory section on “Policy & Legal Framework of AONBs” is a welcome addition.	Page 4-11	No	Noted.
5.3.2	Final paragraph on improved soil health is welcomed.	Page 31	No	Noted.
5.3.3	The Natural Capital diagram and HHAONB Natural Capital Asset table require headings/labels to explain their presence here.	Page 32 & 33	Yes	Agreed. Add captions: “ <u>The relationship between natural capital, ecosystem services and benefits</u> ” “ <u>Natural capital assets and benefits provided within the Howardian Hills AONB</u> ”
5.3.4	Inclusion of an explicit general principle of support for enhancements to the A64 (subject to taking into account the AONB designation and minimising environmental impact) is welcomed.	Page 58	No	Noted.
5.3.5	Objective RTT5 [and again on p94] – request rewording of this to read “ <b>Support</b> proposals for improvement of the A64 Trunk Road through the	Pages 64, 94	Yes	The General Principle bullet point was updated but not the Objective. Amend the text of Objective RTT5 to read: “ <del>Ensure that any</del> <b>Support</b> proposals for improvement of

	AONB, subject to these being fully justified and sensitive...". This would better reflect the general principle set out on p62.			the A64 Trunk Road through the AONB, <u>subject to these being are</u> fully justified and sensitive to local characteristics...."
5.3.6	The new action to support appropriate enabling development where this would conserve and enhance the AONB's most significant heritage assets (HE2.2) is welcomed.	Page 85	No	Noted.
5.3.7	As above for Objective RTT5.	Page 94	Yes	See above.
5.3.8	The document is comprehensive and there are no further sites which the Council would recommend for inclusion.		No	Noted.
Historic England 5.4.1	We support the proposed Vision, especially the intention that the area will still be notable for its large country houses and designed landscapes (two of the defining features of the AONB). We also welcome the intention that the threats to the natural and cultural resources of the AONB will have been mitigated and that these assets will be sympathetically managed.	Page 26	No	Noted.
5.4.2	We support the Key Vision Aims that designated heritage assets will be in sustainable management.	Page 28	No	Noted.
5.4.3	This Section provides a good overview of the historic development of the area and the contribution which its heritage assets make to the special qualities of the AONB. We would endorse the General Principles, Key Issues and the three Objectives which have been proposed for the historic environment.	Page 40	No	Noted.

5.4.4	We support the Objectives for Local Communities especially LC1 (which proposes to assist local communities in identifying and implementing projects that maintain and enhance their character) and LC2 (which encourages voluntary and community engagement with the historic environment of the AONB). Both these Objectives should assist in delivering the Objectives relating to the sustaining the significance of the AONB's historic environment (Objective HE2) and helping people identify the non-designated assets which contribute to the character of their area (Objective HE3).	Page 48 Objectives LC1 & LC2	No	Noted.
5.4.5	The British Geological Society identified a number of historic building stone quarries in the AONB which, although no longer in use, nonetheless potentially still could provide stone needed for the repair of heritage assets in the area (and, therefore, assist in helping to safeguard elements which contribute to the special qualities of the AONB). Therefore, we welcome the support for the opening up of faces to supply local sources of building stone.	Page 58 Page 60 Objective DRE4 Action DRE4.2, page 91	No	Noted.
5.4.6	We welcome the recognition of the fact that many parts of the AONB have significant numbers of heritage assets within and adjacent to the highway including bridges, fingerposts and mileposts. These elements all assist in reinforcing the distinctive character of this part of Yorkshire.	Page 61 Section 2.4.5, Key Facts, ninth bullet-point	No	Noted.
5.4.7	We welcome the intention that traditional direction signs, mile posts and other historic structures within or adjacent to the highway will be appropriately managed.	Page 62 General Principles, seventh bullet-point	No	Noted.

5.4.8	We would endorse the Actions which have been put forward for delivering the Objectives for the historic environment.	Page 84	No	Noted.
5.4.9	The condition enhancement of the historic environment is well covered and realistic, for both designated and non-designated sites.	General	No	Noted.
5.4.10	I was able to navigate around the Plan and cross reference with the Local Sites Map, and the information therein gave me an opportunity to update the database with details of the most recent work on the Scheduled Monuments.		No	Noted.
5.4.11	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?		No	The Mausoleum is included as Site 2.77 in recognition of its significance to the AONB landscape. Any specific proposals coming forward can be included in future versions of the Management Plan as appropriate.
W. Worsley				
5.5.1	First paragraph – The local tiles are orange not red.	Page 13	Yes	'Red' is the term most often used in the planning process, but amend text to read: "...sandstone with <del>red</del> pantile or slate roofs, ..."
5.5.2	Forestry and Woodland - I am surprised that there are only 10-20ha per year felled in the AONB. As we 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.	Page 52	Yes	Agreed. The Forestry Commission have analysed their data and indicate that a figure of 20-30ha per year would be more accurate. Amend text to read: "Clearfelling rates are approximately <del>10-20ha</del> <u>20-30ha</u> per year."
5.5.3	General Principles, bullet point 6 – The words 'where appropriate' should be added to the end of this paragraph. I would not be able to support this otherwise. For example, we have many PAWS that have been softwood for several rotations and I have	Page 53	Yes	Amend text to read: " <u>Where appropriate</u> , the restoration of conifer plantation areas within plantations on Ancient Woodland Sites (PAWS)..."

	consulted many organisations such as the Woodland Trust who are happy with our management practices. I am working on point 11 as this is in my Tree Champion remit.		No	Noted.
5.5.4	Last bullet point. 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.	Page 58	Yes	Amend text to read: "Affordable housing however is only likely to be facilitated through the <del>limited</del> <u>associated</u> provision of market housing."
5.5.5	There is a key issue of very early lorry movements at 4.30/5.00am which disturb small villages. There are operators in the AONB who should stick to agreed lorry movement times.	Page 63	No	Noted.
5.5.6	There are many miles of permitted footpaths in the AONB and these should be recognised in bullet point three.	Page 66	Yes	Amend text to read: "...Public Rights of Way, with 126 miles (202km) of footpaths and 57 miles (93km) of bridleways. <u>There are also a number of permissive footpaths.</u> "
J Galloway 5.6.1	Comments received, no changes suggested.		No	Noted.
North York Moors National Park 5.7	We support the review and note the additional or amended actions that could potentially involve this Authority – listed in a separate Appendix. I can confirm that this Authority can support these actions.		No	Noted.
PLACE 5.8.1	PLACE supports the need for the AONB to be a tranquil area for the benefit and wellbeing of both the residents and also visitors.		No	Noted.

5.8.2	PLACE encourages the need to continue more research into the extent of flora in the AONB and to identify key sites where rare flora requires protection.		No	Noted.
5.8.3	PLACE is also 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	Disagree, at this point in time. Parking areas would need to be surfaced with a bound material such as road planings (suburbanising and locally unpopular) or a grid-cell material back-filled with soil (expensive). The first option in particular would destroy road verge areas permanently, which would be counter-productive. Verge areas recover to some extent during the summer months, but the issue needs to be monitored and some areas may warrant interventions in the future if erosion spreads significantly.
5.8.4	PLACE supports the need to control non-native plant species and infectious plant diseases and stresses the need to liaise closely with the surrounding District Councils where such problems exist near to the border with the AONB.		No	Noted. Work is already carried out in conjunction with Ryedale DC and the North York Moors National Park.
5.8.5	PLACE supports the need to extend entry level, mid-tier and higher tier Stewardship on farms in order to increase and improve the green-space corridors for wildlife and the development of natural flora. PLACE also supports the planting of hedgerows.		No	Noted.
5.8.6	PLACE supports the concept of active forest management and the preservation of ancient woodland. It also supports the planting of deciduous trees in preference to conifers. It further supports the planting of new areas of woodland where this would enhance the AONB and habitat networks.		No	Noted.

5.8.7	<p>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:</p> <ul style="list-style-type: none"> <li>- the District Councils on the Yorkshire Wolds who are progressing an application for UNESCO Geoparks status. The Jurassic Corallian strata in the Howardian Hills AONB are of equal importance.</li> <li>- work closely with the British Geological Survey to establish the geological character and importance of each of the 17 sites.</li> <li>- the JAC or AONB Unit to produce either a booklet on the geology of the AONB or pamphlets on significant sites.</li> </ul>	Action AP2.1, page 98	No	This management action is contained within each of the Priority Sites descriptions in the Landscape Management & Priority Sites document.
			No	Noted. Both achieving and retaining UNESCO Geoparks status takes significant staff resources, which are not currently available within the AONB Team. Should this suggestion continue to be raised, and staff resources identified (perhaps within a partner organisation), then this could be pursued.
			No	The sites were selected following survey of 85 sites by a professional geologist and they will be assessed for full Local Geological Site status via the North Yorkshire Local Geological Sites Panel.
			Yes	Noted. It has been the intention to produce a leaflet for a number of years but this was postponed until the results of the sites surveys were known. This suggestion would be covered under Action AP2.1, but the text should be amended to read: "Publish and distribute information about the AONB <u>and its Special Qualities, for example</u> at popular visitor destinations, in community buildings, <del>and</del> in visitor accommodation <u>and on the AONB website.</u> "
5.8.8	PLACE supports the need to protect the heritage assets; both the archaeology, Scheduled Monuments and the built environment. It also supports the need for owners of large estates within the AONB to work with the Joint Advisory Committee in order to protect the character of the AONB.		No	Noted.
5.8.9	PLACE supports the need for annual action plans for the AONB Unit and that these are monitored by the JAC. The action plans should be both Policy and individual specific within the AONB Unit.		No	Noted. The Annual Action Programmes (available on the AONB website) are policy specific. Making them individual-specific would be excessively detailed, and inappropriate for a team of only two people where tasks

	Achievement of annual targets within the action plan should be the basis of individual's annual appraisal.			are often shared. Acton Programme targets are already used in the annual appraisal process.
Hambleton District Council				
5.9.1	Overall the Council supports the approach.			Noted.
5.9.2	The Council supports the vision and the inclusion of the new section on Natural Capital and Ecosystem Services. <i>Under the heading <b>Regulating soil erosion</b>, 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 practice which may be considered to be appropriate.</i>	Page 30	Yes	Whilst the point is accepted, the bullet points on pp30-31 are a direct copy from the NCA 29 Character Area Profile. As such it's felt to be inappropriate to alter them. The context could however be made clearer, so amend the header paragraph to read: " <u>The NCA 29 Character Area Profile</u> <sup>(30)</sup> <u>considers</u> the principal ecosystem services <del>provided by NCA 29</del> , and their condition/issues, <del>are considered</del> to be:"
5.9.3	<b>HHAONB Natural Capital Asset table</b> It is unclear why there is only one benefit listed for a mineral asset, which is aesthetics. Why not energy as well or any others?	Page 33	Yes	Agreed. Using the definition contained in the Natural Capital Committee handbook, Energy needs to be added to the table as a Benefit.
5.9.4	Hydraulic Fracturing has been linked to Objective DRE4 however this objective only makes reference to 'mineral working' and no reference is given to gas extraction works which the hydraulic fracturing operations represent. I would suggest amending the wording to DRE4 to say, 'Support appropriate mineral-working and <b>energy fuel extraction</b> proposals which.....'	Page 59-60 Objective DRE4	No	The term 'minerals-working' covers all operations involving any exploitation of mineral resources and is compatible with the Minerals & Waste Joint Plan. This Objective is intended to cover hard rock, sand and gravel and building stone as well as hydrocarbons.
5.9.5	<b>Potential future challenges within the AONB Non-hydraulic fracturing</b> - Currently the Government is seeking views on the principle of	Page 59	Yes	Amend the Key Issues bullet point to read: "The exploration for <u>conventional and unconventional</u>

5.9.6	<p>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.</p> <p>Would suggest including definitions on hydraulic (and non-hydraulic) fracturing in the Glossary section.</p>	<p>Pages 101-107</p> <p>Page 102</p> <p>Page 106</p>	<p>Yes, but not for the reason suggested</p>	<p>hydrocarbons, potentially followed by production facilities using hydraulic <u>or non-hydraulic</u> fracturing.”</p> <p>This is a contentious issue at the minute, with potentially two different definitions available (Oil &amp; Gas Act; North Yorkshire Minerals &amp; Waste Joint Plan). As the AONB Management Plan is not a Development Plan Document, it would be inappropriate for it to choose which definition to include.</p> <p>Definitions of conventional and unconventional hydrocarbons could however be added to the Glossary. Amend text to read: “</p> <p><b><u>Conventional hydrocarbons.</u></b> Oil and gas where the reservoir is in porous rock such as sandstone or limestone and can be extracted using traditional drilling techniques.</p> <p><b><u>Unconventional hydrocarbons.</u></b> Oil or gas which cannot be extracted using traditional drilling techniques, including underground coal gasification, coal bed and coal mine methane and shale gas.</p>
5.9.7	<p>The actions seem reasonable.</p>	<p>Pages 72-100</p>	<p>No</p>	<p>Noted.</p>
5.9.8	<p>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.</p>	<p>Landscape Mngmnt &amp; Priority Sites Document</p>	<p>No</p>	<p>The AONB is dealt with as one landscape area, with individual Landscape Zones based on landscape character. Adding the detail suggested would result in an excessive addition to the amount of text, particularly as all the sites are mapped and their locations can be identified in that way (the District boundary is shown on the large map).</p>

5.9.9	The inclusion of priorities and actions on issues relating to climate resilience, air quality improvement and protect/ enhance tree coverage are all welcomed.		No	Noted.
5.9.10	The first paragraph defines what Priority 2 Actions mean but there is no definition of Priority 1 actions. For completeness it may be useful to define the importance of Priority 1 Actions as well.	Page 78	Yes	Priority 1 Actions are those deemed to be of the highest importance and the ones on which work must be undertaken. Amend text to read: “The table also gives a provisional timescale and priority rating for each Action. <u>Priority 1 Actions are those deemed to be of the highest importance and the ones on which resources should be concentrated.</u> Priority 2 Actions are those that are considered to be less critical, or ones for which significant additional resources are likely to be needed.”
5.9.11	Could Group or Area Tree Preservation Orders be used to protect important concentrations of mature hedgerow trees in parts of the AONB?	Page 81	No	Advice from other AONBs indicates that Area TPOs are not favoured because they give blanket coverage to <i>all</i> tree species over a certain size and can therefore become ambiguous as the years go by and former ‘saplings’ grow into larger ‘trees’. Individual TPOs would be a potential option, and this would fall within Action NE2.2.
Yorkshire Wildlife Trust 5.10.1	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?	Page 27	Yes	The Howardian Hills AONB is a highly managed landscape, principally because it contains a significant number of large houses with designed landscapes. Allowing these designed landscapes to lose their definition would be detrimental to the Special Qualities of the AONB. Some areas would however lend themselves to being managed in a less intensive way, so amend wording to read: “The Howardian Hills will continue to be a tranquil and <del>well-</del> <u>sympathetically</u> managed rural area...”
5.10.2	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	Page 27	Yes, but not for the	This comment seems somewhat confused. As ‘agriculture’ includes both arable and pastoral land uses, the suggested term ‘farmland’ is in fact synonymous with ‘agriculture’. It

	<p>'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?</p>		<p>reason suggested</p>	<p>is presumed that the point is referring to the possible widespread conversion of arable land to grassland in the future. This is by no means certain – the Agriculture Bill refers to payments for Public Goods, which includes improving soil health within arable farming regimes. In addition, the Government Advisory Committee on Climate Change has recently indicated that livestock numbers should decrease by 20-50% if the UK's climate change targets are to be met.</p> <p>The term 'farmland' is probably more publicly understandable in The Vision however, so amend text to read: "...notable for its extensive woodland, rolling <u>farmland agricultural fields</u>, large country houses..."</p>
5.10.3	<p>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?)</p>	<p>Page 28 NCES1.4, page 80</p>	<p>Yes</p>	<p>As no detailed mapping has been undertaken it is not possible to include a map at this stage. It is also likely to need to be at a more detailed scale than suggested. This Action could however be specifically mentioned in the Action Programme, so amend text of Action NCES1.4 to read: "<del>Start</del> <u>Produce an 'opportunity map' to illustrate developing a model for what a resilient how the Howardian Hills AONB landscape might become more resilient to future challenges should look like.</u>"</p>
5.10.4	<p>Bullet 1: Agreed and this relates to the comment above – will a resilient Howardian Hills AONB landscape continue to be described as rolling agricultural fields?</p>	<p>Page 32</p>	<p>No</p>	<p>See 5.10.2 above.</p>
5.10.5	<p>Bullet 4: Is this more of an objective than an issue?</p>	<p>Page 32</p>	<p>Yes, but not for the reason suggested. Page 98</p>	<p>It is considered that this can be both an objective and an Issue, as partnership working requires collaboration and effort on both sides.</p> <p>Action IM1.2 could however be amended to read: "Continue <u>and expand</u> partnership arrangements with the North York Moors National Park Authority, as appropriate."</p>

5.10.6	<p>NCES1: How about 'obtain/capture/secure and apply/disseminate' rather than simply 'improve' knowledge of the AONB's natural capital assets...?</p> <p>Should there be another objective which relates to the second key issue of the impact of management/development decisions on natural capital assets and ecosystem services? How will this be monitored, what would be monitored and what action might be taken if detrimental impacts were being recorded?</p>	Pages 32 & 80	Yes	<p>Amend text of NCES1 to read: "<del>Improve knowledge</del> <u>Gain a better understanding</u> of the AONB's natural capital assets, their quality..." See also Actions NCES1.1 to NCES1.4 (as amended at 5.10.3 above) on p.80.</p> <p>See NCES1.3 and NCES2.2 on p.80.</p> <p>This will be monitored during day-to-day work and responses altered if negative effects are becoming apparent.</p>
5.10.7	There is no mention of illegal raptor persecution and other wildlife crime - stamping this out should be intrinsic to AONBs.	Page 35-44	No	As far as we are aware there have been no instances of raptor persecution (which by definition is all illegal) within the Howardian Hills AONB. It is not therefore considered necessary to refer to it specifically. The wildlife crimes of hare and deer coursing are mentioned on p.46 and the AONB Team has worked with North Yorkshire Police to establish a new Rural Watch group covering the Howardian Hills.
5.10.8	There is no mention of wildlife extinction which should be acknowledged as as big a threat as climate change. We failed to achieve the 2010 biodiversity targets and we are failing to achieve the 2020 biodiversity targets set at the 2010 UN conference in Aichi, Japan.	Page 35-44	No	Noted. The Objectives of the Plan are aiming to avoid local wildlife extinctions, but in some instances very small local populations could be threatened by actions over which the AONB cannot exert any control, e.g. populations of knapweed broomrape.
5.10.9	Are the species mentioned still present in the AONB e.g. baneberry and how these key species are faring? Are these key species being monitored, or could they be?	Page 35	No	A recent survey being carried out independently by an amateur botanist confirmed that these species are still present. No routine monitoring mechanisms are in place, as far as is known.

5.10.10	Para 2: is it worth mentioning the Dales to Vale River Network too as parts of the AONB feed into the Lower Swale, Ouse and Foss catchments?	Page 37	Yes Pages 79-99	We haven't had any contact with the DVRN, as the Foss catchment is a relatively small proportion of the AONB area, but they can be added to the list of Partner Organisations in the Action Programme where appropriate.
5.10.11	Para 4: as there are projects in the pipeline for threatened arable flowers (Cornfield Flower Project), white-clawed crayfish (Ryevitalise), turtle dove (via NYMNP Turtle Dove Project) and water vole should these species be mentioned or is there sufficient data already?	Page 37	No	This is a generic point and a more extensive list is not considered to be necessary. Farmland birds are specifically mentioned because, in the past at least, much of the agri-environment scheme targeting of options has been based on the presence/absence of this group of species. We know that there are good population distributions and abundance within the AONB but little hard data to corroborate this.
5.10.12	Para 8: should this refer to the development of a strategic approach and action at a catchment-scale? Could it say <b>will</b> be monitored rather than <b>should</b> ?	Page 37	No	The wording of every General Principle in the Plan uses the word 'should', for logical reasons. To change only one would be inconsistent. Actions NE6.1 and NE6.2 on p. 83 flow directly from this General Principle.
5.10.13	Para 9: is this referring to the AONB's intents re: local policy or an aim to lobby re: national policy?	Page 37	No	See Actions AG1.2 and AG1.3 on p.88.
5.10.14	NE6: see previous comment re: invasive species (two paragraphs above). The AONB should be as proactive as possible (mobilising locals to tackle and providing advice to landowners on how to deal with them etc.).	Page 38 NE6	No	As above. See Actions NE6.1 and NE6.2 on p.83.
5.10.15	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	Page 38	No	Disagree. Actions NE3.1 to NE3.5 on p.82 have a clear and logical Lawton Principles-based progression of managing the best, buffering and extending the best, restoring degraded, creating new and working at a landscape scale. The Management Plan document needs to be read in its entirety to understand how the Objectives, and hence ultimately the Vision, will be implemented.

5.10.16	<p>which is laudable, but not around expanding, buffering and linking.</p> <p>Could this show potential areas of expansion, buffer zones and connections as well as the sites?</p>	Page 39 Figure 5	No	As indicated in 5.10.3 above, no detailed mapping work has been completed as yet and, when it is completed, it would not be appropriate to present it at such a coarse scale. The mapping suggested will fall under the amended Action NCES1.4 and also Action NE3.5. These finer-level actions are detailed in Annual Action Programmes, which build over 5-year periods to deliver the overall Action.
5.10.17	Bullet 10: is this referring to the AONB's intents re: local policy or an aim to lobby re: national policy?	Page 50	No	See 5.10.13 above.
5.10.18	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? Similarly re grassland ('a significant proportion of the grassland in the AONB was converted to arable cropping').	Page 51	No	A detailed mapping exercise on hedgerow removal was carried out using map regression techniques in 1995. Presenting the large and detailed overlay maps in the Management Plan would be impossible and inappropriate. The results of the exercise were incorporated into the Landscape Management section of the Landscape Management & Priority Sites document, which indicates where hedgerow restoration is a priority. The Landscape Management Priorities are updated every 5 years in light of work funded by either the AONB (see Action AG2.2) or national agri-environment schemes. The AONB Committee supports the restoration of on average 1km of hedgerow every year.
5.10.19	Very surprised there are no mature ash trees within the AONB showing any signs of <i>Hymenoscyphus fraxineus</i> – I would just double check that this is accurate.	Page 52	Yes	The text is not meant to convey the impression that absolutely no mature ash trees in the AONB have been affected by Ash Chalara, so the text should be amended to read: "Chalara Dieback of Ash is now widespread throughout the AONB, although mature trees don't appear to have been affected <u>significantly as yet.</u> "

5.10.20	A more robust approach to ash dieback needs to be taken if the AONB is to maintain/increase its woodland cover. Plans need to be put in place to allow natural regeneration or carry out replanting of other native species, otherwise significant woodland cover may be lost. Also, consider the impacts on non-woodland landscapes of loss of ash.		No	Natural regeneration in appropriate situations is encouraged via Action FW4.1 and is mentioned in responses to Felling Licence applications. The Forestry Commission is the body ultimately responsible for authorising woodland management operations and it isn't accepted that significant woodland cover will be lost, as any felling of diseased ash will need to be accompanied by re-planting of a replacement crop. The AONB has been funding the planting of replacement in-field and boundary trees (generally local provenance oak) for many years.
5.10.21	FW4: may not be clear to all what is meant by 'selected provenance' - could include in the definitions at the end of the document.	Pages 55 & 89 FW4	Yes	Although the term was chosen by a forester, so professional woodland managers should understand it, the text should be altered to read: "Encourage the use of trees and shrubs <del>selected</del> of <u>climate-appropriate</u> provenance <del>trees and shrubs</del> when planting or restocking, to develop future resilience." Amend Action FW4.2 to read: "Promote the use of <u>climate-appropriate</u> <del>selected</del> provenance nursery plants when restocking."
5.10.22	FW5: how about mapping where the AONB might prefer these to be? Could be shown on figure 7?	Page 55 FW5	No	As indicated in 5.10.3 above, no detailed mapping work has been completed as yet and, when it is completed, it would not be appropriate to present it at such a coarse scale. The mapping suggested will fall under the amended Action NCES1.4 and also Action NE3.5. These finer-level actions are detailed in Annual Action Programmes, which build over 5-year periods to deliver the overall Action.
5.10.23	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?	Page 58	No	As the Management Plan is a Statutory document for the Local Authorities, not the AONB Committee, it needs to be consistent with North Yorkshire Minerals & Waste Joint Plan policies, as well as with national legislation. The second bullet point on p.58 explains this.

5.10.24	RTT objectives: Should there be an objective which directly relates to this identified principle; 'Special Interest Road Verges should be managed to conserve and enhance their biodiversity value, balanced with the needs of road safety. Should these be shown on a map, along with opportunities for linkages/new additions?	Page 64	Yes	<p>This is included as Action NE3.1. Amend text to add a cross-reference to the RTT Objectives box: "<u>Special Interest Road Verge management → Objective NE3</u>"</p> <p>All the verges in the AONB were surveyed in 1997 (see p.35) and mapped on a GIS database. 45 verges have been managed each year to prevent loss to scrub growth.</p>
5.10.25	RTT5: perhaps wording to say that road improvements will ensure that wildlife movement is not impeded and appropriate design and mitigation will be utilised.	Page 64 RTT5	No	These aims are already explicitly or implicitly encompassed in the current wording of both Objective RTT5 and Action RTT5.1 (p.94).
5.10.26	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.	Pages 61-64	No	The Fisherman's Car Park at Castle Howard was closed by the landowners in response to incidents of anti-social behaviour. We encouraged the provision of new parking facilities, but ultimately we have no control over the actions taken by private landowners on their own land.
5.10.27	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.	Pages 70-71	No	Noted. The social media presence is felt to be as much as current AONB Team staff resources and priorities will allow.
5.10.28	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	Noted. The shape depicted is discernible in almost every photo of the AONB landscape, and was actually drawn directly from a photo. No AONBs or National Parks have a strapline, so this is not considered necessary.
5.10.29	Condition indicators: 3. Biodiversity – include total extent of protected areas (which should increase if intending to buffer/extend?). Also include a connectivity indicator? Include habitat and species status (both EU and UK priority) as well as SSSI status? Include farmland birds? Could include	Pages 76-77	No	Noted. The Condition Indicators are designed to give a basic overview of the overall Condition of the AONB across a broad range of categories linked to the AONB's Special Qualities and Purposes of Designation. They are not intended to focus solely on biodiversity as suggested. Some of the suggestions are factually incorrect (protected areas such as SSSIs and SINCs will <i>not</i> automatically in size

	<p>butterflies as a proxy for invertebrates and bats as a proxy for mammals?</p> <p>Possibly include threatened arable flowers due to long-term cornfield flower project? Include distribution of pollinators? Include biodiversity data for decision making (a. cumulative number of records, b. number of publicly accessible records at 1km2 resolution or better).</p> <p>No 9. Awareness of the AONB designation - should there be an indicator for not only public awareness but taking action, e.g. volunteer time spent working on the AONB? Finally, could include pressure indicators – climate change, air pollution, and invasive species? These suggestions would bring it into line with Defra (2018) <i>UK Biodiversity Indicators 2018</i>, London. It seems as though some of this is captured in the State of AONB report, so it's not clear why it's not referred to here? As per earlier comment, should the impact of management/development decisions on natural capital assets and ecosystem services also be monitored and therefore an indicator?</p>			<p>if they are buffered or extended), and we don't currently have any data for most of the suggestions made. Data for some of the Indicators suggested (e.g. Volunteer time) is reported as part of Performance (as opposed to Condition) Indicators.</p> <p>It is unclear how some of the suggestions (e.g. number of data records) would give an indication of the actual Condition of the AONB.</p> <p>The Condition Indicators will undoubtedly be refined in future Management Plans when more accurate methodologies for measuring natural capital and ecosystem services provision are developed. Some of the Indicators suggested here could also be explored further, to evaluate whether they might be useful indicators of AONB Condition and whether sufficient data is available to make them statistically valid.</p>
5.10.30	<p>Action plan: NCE3 – if monitoring climate change anyway, why not include it as a pressure indicator as above? NE1 – if conducting this survey and monitoring then again they should be indicators?</p>	<p>Pages 80-99 NCE3 NE1</p>	No	<p>See above.</p> <p>The role of the JAC in relation to Action NE1.1 is Support, so the surveys will not be carried out directly by the AONB Unit. It would therefore be inappropriate to include this as an Indicator, if data supply cannot reasonably be guaranteed.</p>
5.10.31	<p>There are a lot of priority 1 actions – is this realistic with the resources available?</p>		No	<p>Priority 1 Actions are those deemed to be of the highest importance and the ones on which work must be undertaken. Inevitably the extent of that work will depend on relative priorities at any given time, and the availability of both internal and external resources. The availability of resources should not however be the only deciding factor</p>

5.10.32	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 could be presented to show whether these species are expanding (either in population or distribution terms)?	State of the AONB Report and Map	No	when assessing what Actions should be Priority 1 and Priority 2.  The AONB Management Plan is a Statutory document and there is no discretion as to whether it is produced or not. As indicated above, the Indicators need to reflect the breadth of the Special Qualities and Purposes of Designation, rather than being solely related to biodiversity.
5.10.33	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. The Management Plan document needs to be read in its entirety to understand how the Objectives, and hence ultimately the Vision, will be implemented. The finer-level actions are detailed in Annual Action Programmes, which build over 5-year periods to deliver the overall Action, and two years' worth of Action Programmes are available, on a rolling basis, on the AONB website.
5.10.34	Should the EA be part of the JAC? E.g. River Derwent water quality, and impact on two catchment partnerships etc.			The constitution of the JAC is periodically reviewed, in order to ensure that all primary interests are covered and that there is a balance between public and private sector viewpoints. When the Constitution was last reviewed in 2004 (i.e. prior to significant reductions in EA staff resources), the EA indicated that it was able to participate in partnership project delivery but not in 'steering group' meetings. The fact that no comments have been submitted in relation to the Management Plan review or its associated Strategic Environmental Assessment, either this year or 5 years ago, doesn't indicate that their position has changed.

Community First Yorkshire 5.11.1	The reference to the changes in the way the plan is set out makes it easy to give proper consideration to that which has been retained as well as that which is new to the plan.		No	Noted.
5.11.2	In terms of content 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, initiating activities in parishes and market towns to create vibrant communities. Volunteers and VCS organisations are a strong 'attribute' of the area. We would welcome reference to, and acknowledgement of, the importance of this sector and the people active within it.		Yes	Add a new bullet point, p.46, right-hand column, above the bullet point relating to Parish Plans: <u>"There is generally a strong voluntary and community sector within the AONB. A variety of groups provide voluntary and contracted services to support people, maintain the AONB landscape, facilitate access to cultural and heritage resources and initiate activities in local parishes and market towns."</u>
5.11.3	The rich heritage should be seen as a cross-partner organisation priority to sustain and make known more. Collaborative investment planning across relevant funders and planners should bring this in as a common priority.	Pages 35-44	No	Noted.
5.11.4	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.	Pages 45-64	No	This is felt to be adequately referenced on pp58 and 59, and Objective DRE7.
5.11.5	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	Page 58	Yes	Amend the General Principle on Local Needs housing to read: "...Affordable housing however is only likely to be facilitated through the <del>limited</del> <u>associated</u> provision of market housing, <u>although community-led housing</u>

	towns of community housing as a means of ensuring people have access to affordable housing. Land planning and building planning should be factoring this into their priorities. Housing for essential workers needs to go beyond medical and teaching staff, to care workers and apprentices, and needs to be part of planning criteria.			<u>initiatives could have an important role to play in identifying and bringing forward suitable sites”.</u>
5.11.6	Community-led housing initiatives could be part of the awareness and promotion work of the AONB.	Pages 70-71	No	This would need to be part of Local Development Plan policy.
5.11.7	The priority settlement sites in the National Park plan should be taken into consideration to join up the likely flow of population to sites and support services catchment areas.		No	Noted.
Forestry Commission 5.12.1	Information from the FC Evidence Team shows Woods in Management – i.e. has a Management Plan and or a Felling License – as 78% of woods. This is higher than your UKWAS figure (which is quoted as 60%) and is also the highest of all AONBs in England. UKWAS is an independent scheme of the FC – did you get the figures from another source?	Pages 52-56	Yes	Noted. The information on Woodland in Management is supplied to AONBs by the FC centrally, and the 78% figure has been used in this updated version of the Management Plan. Discussions with Yorwoods indicate that the principal landholdings within UKWAS are the Castle Howard and Hovingham Estates. The Brandsby Estate woodlands are also believed to be Certified. An approximate figure will therefore be re-calculated based on this information.
5.12.2	It is good to see recognition of the challenges associated with pests and diseases alongside the importance of management planning.	Page 31	No	Noted.
5.12.3	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. They can also play a role in increasing the resilience on existing woodlands and supporting the delivery of the 25YEP.	FW5, Pages 55 & 89	Yes	Amend text to read on p.31: “Improving soil health is felt to be one of the single most significant actions that can be taken to mitigate against climate change impacts in the Howardian Hills. Better soil health could ... <u>increased carbon storage</u> , reduced soil erosion and improved water quality. <u>Similar benefits could also be achieved from</u>

				<p><u>increased tree and woodland planting, in targeted locations where this would also conserve and/or enhance landscape character.</u></p> <p>Amend FW5 to read: “Encourage new areas of woodland where these would conserve or enhance the Special Qualities of the AONB, <del>or</del> <u>enhance habitat or natural capital networks, or provide ecosystem services benefits.</u>”</p>
CPRE North Yorkshire 5.13.1	CPRE North Yorkshire believe that the content of the new Management Plan is consistent with other such plans across the country and welcomes the revised context – especially the provision of the legal context and reasons for designations. This provides clarity for developers, land managers and members of the public and those with an interest in the AONB in general.		No	Noted.
5.13.2	CPRE North Yorkshire believe that natural capital and ecosystems services are a vital component to the AONB and where much of its beauty is derived. Gaining a greater understanding of these important areas is fundamental to the management of the AONB.	Pages 26-33	No	Noted.
5.13.3	CPRE North Yorkshire is encouraged to see that so much emphasis has been given to the natural and historic environment as is an important area which is in line with their statutory duty.	Pages 35-44	No	Noted.
5.13.4	The recognition afforded to the role agricultural practises play within the AONB and its rural nature in general is particularly welcomed. The AONB is predominantly rural with many scattered villages and hamlets. All the market towns within the vicinity which serve these settlements are out of the AONB	Pages 45-64	No	Noted.

	<p>therefore it is essential that the maintenance and protection of the existing rural environment is achieved. CPRE North Yorkshire are encouraged by the fact the AONB recognises that BREXIT may impact these areas in the future and appropriate diversification or projects may be required to facilitate the continuation of rural-based livelihoods and maintain a thriving population in the AONB to reduce further declining populations.</p>			
5.13.5	<p>This section is welcomed.</p>	<p>Pages 65-69</p>	<p>No</p>	<p>Noted.</p>
5.13.6	<p>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. Interactive elements and links to YouTube are increasingly popular. Asking the wider AONB Partnership and JAC to promote each other also enables platforms to reach wider audiences and followers in different areas.</p>	<p>Pages 70-71</p>	<p>No</p>	<p>Noted. Creating a presence on Instagram and Facebook has been explored, but all social media platforms rely on fairly continuous input if they are to be truly effective. The social media presence is felt to be as much as current AONB Team staff resources and priorities will allow.</p>
5.13.7	<p>The implementation and monitoring section is useful and should aid delivery of the Plan bearing in mind that DEFRA's new Environment Plan and future 'Hobhouse Report' may have future implications for the AONB as could the results of the Glover Report.</p>	<p>Pages 72-100</p>	<p>No</p>	<p>Noted. For the sake of clarity, the Glover Report is the name of the new 'Hobhouse Report' mooted in the 25 Year Environment Plan.</p>
5.13.8	<p>CPRE North Yorkshire are of the opinion that the Priority Sites are appropriate whilst recognising that all of the AONB is special and requires particular protection against inappropriate developments for the reasons it was originally designated.</p>	<p>Landscape Mgt and Priority Sites Doc</p>	<p>No</p>	<p>Noted.</p>

5.13.9	This provides the evidence as to which areas need prioritising and why. The large map provides clarity for all users and potential developers alongside members of the public. It is useful in planning terms.	State of the AONB Report	No	Noted.
5.13.10	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.	General	No	Noted. The constitution of the JAC is periodically reviewed, in order to ensure that all primary interests are covered and that there is a balance between public and private sector viewpoints. The Management Plan is a Statutory document for the two District Councils in whose area the AONB lies, so they are an integral part of delivery of the Plan. The National Trust has one small site within the AONB, as opposed to the large landholdings found in many other AONBs, whilst delivery in partnership with the North York Moors National Park is already significant and is referenced in the Action Programme.
5.13.11	<p>In relation to policy DRE4 and reference to exploration and production of hydraulic fracturing applications, 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.</p> <p>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> <p>It is considered that the bullet points listed within the Action Programme on pg.87 are more appropriate and this should be explained further to</p>	<p>DRE4 Page 58</p> <p>Page 87</p>	<p>No</p> <p>No</p> <p>Yes, but not for the</p>	<p>As the Management Plan is a Statutory document for the Local Authorities, not the AONB Committee, it needs to be consistent with North Yorkshire Minerals &amp; Waste Joint Plan policies, as well as with national legislation. The second bullet point on p.58 explains this.</p> <p>The Major Development Test is an integral part of both the National Planning Policy Framework and the local Minerals &amp; Waste Joint Plan, so mentioning it here would be duplication. In addition, appropriate small-scale extraction of stone for local building needs (DRE4.2) would not necessarily be Major Development, so including the suggested reference would be inconsistent/misleading.</p> <p>The Action Programme is an integral part of the Management Plan document. Repeating all the Actions (for all the Objectives) in the main part of the Plan would</p>

	provide clarity to all readers within the main body of the document.		reason suggested	be unnecessary duplication and would lengthen the document significantly. The Objectives box on p.60 states that specific Actions are contained in the Action Programme, but this wording (throughout the Plan) and the cross-references to other Actions could be moved to the bottom of the Objectives boxes and emboldened to make them more visually prominent.
Frack Free Ryedale 5.14.1	It is clear that the Howardian Hills Area of Outstanding Natural Beauty has to be afforded the same level of protection as our National Parks. AONBs recognise the true value of a landscape as a living canvas. FFR are supportive of the AONBs approach that sees the oil and gas industry (whether it is conventional or unconventional extraction) as a threat to the special qualities of the AONB, and the setting of the AONB.		No	Noted.
5.14.2	FFR 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.		No	This is a common misconception. The Minerals Planning Authority has a Statutory Duty to have Regard to the purposes of AONB designation, and will consult the AONB managing organisation in relation to Plan making and development management. The AONB is not however a Statutory Consultee per se.
5.14.3	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.		No	Please see second full bullet point on p.58 and Action DRE1.1 on p.90.
5.14.4	FFR consider that section 1.5 of the management plan recognises that plans for the area are set by	Pages 21-23	No	Noted. Objective DRE4 on pp.60 and 91 makes it clear that minerals-working proposals will need to pass the

	<p>other bodies. FFR consider that it would be appropriate to confirm that the management plan should restate its purpose to ‘keep from harm’ (conserve) and ‘improve’ (enhance) the AONB as key requirements in any development proposal for it to be considered acceptable in this section. The reasoning being that FFR do not believe there is any realistic possibility of mitigating the effects of oil and gas development (irrespective of the stage of development – i.e. exploration, appraisal etc.) against the special landscape qualities of the AONB or its setting.</p>			<p>‘conserve and enhance’ test, with the Actions DRE4.1 and DRE4.2 on p. 91 reiterating this approach.</p>
5.14.5	<p>It is important to note in a recent legal challenge on 05 November 2018 to the Written Ministerial Statement 17 May 2018 (made by Rt Hon James Brokenshire and Rt Hon Greg Clarke) that one of the most senior planning Judges in the country (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. This is mentioned as it will have effect on the ‘setting of AONBs and National Parks’ in the plan area.</p>		No	<p>Noted. The current 2014-19 AONB Management Plan was used as a reference document in the preparation of the Draft North Yorkshire Minerals &amp; Waste Joint Plan. The current and new AONB Management Plans will likewise be used to support the policy position taken in the Draft Joint Plan, and will be Material Considerations in the development management process.</p>
5.14.6	<p>FFR are supportive of the wide-ranging cross referencing across most policies relating to oil and gas development.</p>		No	<p>Noted.</p>

<p>North Yorkshire County Council</p> <p>5.15.1</p>	<p>The Howardian Hills AONB Management Plan can help facilitate the delivery and contribute to the achievement of some of the key priorities of the County Council. For that reason, we welcome and support preparation of the Management Plan 2019-2024.</p>		<p>No</p>	<p>Noted.</p>
<p>5.15.2</p>	<p>The document is generally positive in its promotion of better land management techniques, improvement in soil health, both of which have a positive effect upon the functioning of drainage systems and also gives benefits to the downstream catchment. 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.</p>		<p>No</p>	<p>Noted. There are no conurbations within the AONB area, nor any which water draining from the AONB flows into. The two principal settlements which could be affected by water run-off from the Howardian Hills are Malton (River Rye into River Derwent) and York (River Foss). Measures are included in the Plan which will help to mitigate both water run-off and diffuse pollution, but the AONB forms a very small part of the two catchments referred to above.</p>
<p>5.15.3</p>	<p><i>FW5 - Increased tree planting and establishment of new woodland could be delivered in locations which give the most 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.</p>	<p>Pages 55 &amp; 89</p>	<p>Yes</p>	<p>Amend FW5 to read: “Encourage new areas of woodland where these would conserve or enhance the Special Qualities of the AONB, <del>or</del> enhance habitat <u>or natural capital</u> networks, <u>or provide ecosystem services benefits.</u>”</p>
<p>5.15.4</p>	<p>The Plan is generally supportive of development, whilst it states that this should be encouraged in line with the wider ambitions of the AONB. Section 2.4.5 ROADS, TRANSPORT AND TRAFFIC MANAGEMENT explains (correctly) that the work of NYCC as Highway Authority is limited by resources and that work centres around maintenance, and</p>	<p>Page 61</p>	<p>No</p>	<p>Whilst the point is accepted, it’s felt that using new development to address some of the traffic issues highlighted in the Plan risks damaging habitats and tranquillity. Rat-running is unlikely to be solved by developer-funded works, as that issue is principally one of traffic using a route as a short-cut and widening it could worsen the problem. In addition, it isn’t felt that there are</p>

	<p>opportunities for improvement are targeted at locations with significant problems. The document does not however presently tie the two together and recognise that necessary proportionate improvements to the highway network in order that the network can accommodate a 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. Similarly, the document could perhaps extend the reference to the positive promotion of sustainable traffic modes to how it can be delivered and how it can give assurance to the permitting of development, during the DC process.</p>			<p>likely to be any developments within the AONB that are so large as to warrant significant highway improvements. Some developments can also have direct adverse impacts on habitats, e.g. the creation of a footway along a grass verge, required by Condition but likely to result in significant loss of habitat for a rare species whose distribution within the AONB is seriously threatened.</p>
5.15.5	<p>We support the historic environment objectives of the plan. We have previously reviewed the historic environment chapter of the plan and the few minor comments that were made have been incorporated.</p>	Page 40	No	<p>Because the conservation and enhancement of natural beauty is the primary purpose of designation, it's felt that the AONB's role in relation to the promotion of sustainable transport modes as part of the DC process is to ensure that Travel Plans (and their associated infrastructure) do not have adverse impacts on the Special Qualities of the AONB (as illustrated above). The Local Highway Authority and LPA will be using national and local policy guidance to promote sustainable travel, so no further support is felt to be necessary in this respect.</p>
5.15.6	<p>The Management Plan revisions document is clear and precise. 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</p>	Page 35	Yes	<p>Agreed. Amend all references to "<del>BAP habitats and species</del>" to read "<u>Priority Habitats and Species.</u>" Add reference to "<u>Natural Environment &amp; Rural Communities (NERC) Act s.41</u>" in appropriate locations where this would aid understanding.</p>

	<p>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 &amp; Rural Communities Act 2006, though admittedly this isn't a very snappy term. It might be better to refer to 'Priority Habitats' – slightly vaguer but self-explanatory.</p>			<p>Amend the definition of Priority Habitats and Species in the Glossary to read: “Habitats and species <u>recognised as being of Principal Importance for the conservation of biodiversity under Section 41 of the Natural Environment &amp; Rural Communities listed under Section 41 of the NERC Act 2006.</u>”</p> <p>Retain references to LBAP targets where appropriate, as there is still an LBAP covering the AONB area (although as indicated it too is dated).</p>
5.15.7	<p>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.</p>	Page 35	No	<p>Noted. The age of much of the data relating to the AONB is a significant issue, but it seems unlikely that a survey of the type carried out in 1992 will ever be repeated. Use needs to be made of new technologies and mapping datasets however, to obtain a more up-to-date habitat inventory of the AONB.</p>
5.15.8	<p>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 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.</p>	Pages 57-60 Objective DRE4	No	Noted.

<p>Natural England 5.16.1</p>	<p>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.</p>		<p>No</p>	<p>Noted.</p>
<p>5.16.2</p>	<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"> <li>• The use of the landscape character assessment as a strong evidence base for the Plan and the clear demonstration of the hierarchy of assessments.</li> <li>• Recognition of the National Character Area profiles and associated Statements of Environmental Opportunity.</li> <li>• The highlighting of natural capital and ecosystems services.</li> <li>• Recognition and policies that will allow actions towards the delivery of the Biodiversity 2020 targets.</li> </ul>		<p>No</p>	<p>Noted.</p>
<p>5.16.3</p>	<p>We are pleased that at all stages of the development and consultation process our comments have been considered and incorporated.</p> <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>		<p>No</p>	<p>Noted.</p>

5.16.4	<ul style="list-style-type: none"> <li>• Adding strength to select objectives by ensuring that all are suitably prescriptive, thereby ensuring all the targets are measurable and specific.</li> <li>• 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.</li> </ul> <p>Subsequent steps should seek to understand implications of intervention and inform future management to enhance the natural capital assets and maintain a sustainable supply of ecosystem services/benefits. We recognise this is an ongoing process rather than a new start.</p> <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>	<p>Pages 32 &amp; 80</p> <p>Page 80</p>	<p>No</p> <p>Yes</p> <p>No</p> <p>No</p>	<p>Noted. To some extent the Objectives are not intended to be very prescriptive. They are strategic goals, with more prescriptive Actions for the next 5 years detailed in the Action Programme. Even finer-level actions are contained in Annual Action Programmes, which build over the 5-year Management Plan periods to deliver the overall Action, and further the achievement of the Objective. Performance against delivery of the Annual Action Programmes is monitored quarterly and reposted annually to the JAC</p> <p>Agreed. Amend text of NCES1 to read: “<del>Improve knowledge</del> <u>Gain a better understanding</u> of the AONB’s natural capital assets, their quality...” Opportunity mapping would also be a useful mechanism for identifying existing stocks of natural capital and opportunities for expansion. Amend text of Action NCES1.4 to read: “<del>Start</del> <u>Produce an ‘opportunity map’ to illustrate developing a model for what a resilient</u> <u>how the Howardian Hills AONB landscape might become more resilient to future challenges</u> <del>should look like.</del>”</p> <p>Agreed. See Actions NCES1.3 and NCES2.2 on p.80.</p> <p>Noted.</p>
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5.16.5	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.		No	Noted.
North Yorkshire Local Access Forum 5.17.1	Essentially we applaud your plan and your recognition of the importance that rights of way play not just for their visitors to the AONB but for every-day communities. However, there is so much emphasis on nature conservation, that we are somewhat concerned that there may be cases where Ryedale/Howardian Hills management needs to bear in mind that clearing sections of roadside verge may be crucial to the safety of equestrians needing a safe link between two off-road routes, and that conservation should be managed on a site-by-site basis rather than an overriding priority.	Pages 66-68	No	It should be noted that the primary Statutory Purpose of AONBs is the conservation and enhancement of natural beauty, with the demand for recreation being met where this is consistent with the primary Purpose (see p.4). An exercise was carried out in 2009 to identify on-road links of less than 200m between Public Rights of Way (both Footpaths and Bridleways), for exactly the reason mentioned. No links were identified where it was felt to be necessary to carry out specific verge management work to assist path users. The exercise has recently been repeated, to identify links from villages to their nearby Public Rights of Way. Road verges on these links will be assessed to determine whether vegetation or scrub growth is preventing local residents accessing them easily.