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Dear Mr Blake

31 January 2014

**Wye Valley Area of Outstanding Natural Beauty (AONB)  
Consultation Draft 2014-19**

Thank you for giving Natural Resources Wales (NRW) the opportunity to comment on the draft Wye Valley AONB Management Plan 2014-2019. Our comments are made in the context of our roles as consultation body under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 and adviser to the Welsh Government on matters pertaining to the natural heritage of Wales and its inshore waters.

NRW welcome the review that has been undertaken of the existing management plan. Our comments are provided in the attached annex.

We note and agree with the approach that much of the content of the existing plan is still of relevance and changes have been made to ensure that the Plan is up dated where appropriate.

We hope you find these comments helpful. Please do not hesitate to contact Miki Miyata-Lee, Senior Recreation and Partnerships Officer or Richard Jones, Team Leader Monmouthshire and Eastern Valleys in the first instance if you wish to discuss our response further.

Yours sincerely

Rhian Jardine  
Head of Sustainable Communities

## Annex 1

### Wye Valley AONB Management Plan

#### Consultation Draft 2014-19

#### Comments from Natural Resources Wales

##### General Comments

1. NRW welcomes the comprehensive, integrated and thorough draft Plan, which is a revision of the existing five year Plan.
2. We note that there are a number of documents allied to the Plan which will also require revision. Key to supporting the Management Plan is the State of the AONB report which sets out the main characteristics (resources) of the AONB upon which the Special Qualities are based and the forces for change acting on them. Vital to the report identifies the trends, improving or declining in the Special Qualities. Without this evidence to underpin decision making it could be difficult to revise the Management Plan in a transparent way. Therefore, NRW recommends that the revised State of the AONB report be made available as soon as possible to ensure robust revisions are made and for stakeholder information too.
3. The current Plan already has an SEA and HRA. You will be aware these assessment processes are iterative. We would therefore advise that the existing SEA and HRA are revised if, following consultation, the new Management Plan is significantly changed from the last.
4. NRW is recommending the adoption of an Ecosystems Approach as you acknowledge in section 4.2. This Approach advocates enhanced information on the societal value of the AONB for stakeholders, wider engagement, generation of management options and consensus building. Although mentioned in the Plan it could be beneficial to apply the Approach more fully through the consultation process.
5. Natural Resource Management is referred to in 4.1.3 and the thinking is at an early stage although confirmed as being developed at a catchment scale. With this in mind it may be helpful to include some reference to sharing management experience beyond the AONB boundary into the surrounding catchment if staff resources allow.
6. Maps are a very useful visual tool and the two attractive maps in the draft Plan could be perhaps better deployed at the beginning rather than the end of the document.
7. Also to aid clarity and understanding we would recommend that early in the draft (perhaps in 1.3) the Management Plan and its allied documents are clearly set out, along with the relationship to LDP's etc. The allied documents include the SoAONB report, the Action Plan, the SEA / HRA assessment and could refer to any guidance notes Wye Valley have produced e.g. on small scale renewables.
8. The Special Qualities of the AONB are very important and should be highly visible in the Plan. We suggest that their position in the Plan be promoted and be made more prominent and their location moved to earlier in the document as opposed to being located in table 8.
9. It is noted that the new draft no longer includes an appendix containing a glossary. NRW recommends including such an appendix. In addition, a list of key 'supporting documents' and references could usefully be included with links to selected useful websites.
10. Another useful section as a quick reference for stakeholders would be 'What has changed in this Plan since the last one?' This in our view would aid and promote understanding and transparency.
11. The Strategic Objectives should ideally be SMART as recommended in the existing 'CCW Guidance on the Review of AONB Management Plans' 2009. Whilst our view is that as currently written the objectives are not SMART, it is essential that the actions within the Action Plan are SMART as these effectively support and underpin the Objectives.

12. We recommend that reference is made to the Welsh Government draft document 'Taking the Long View' that sets the direction for Welsh Protected Landscapes. It is particularly relevant to the Community Development aspects of the draft Plan.
13. Whilst recognising the work on the ground to provide bilingual information and guided walks it would be helpful to include a reference in the Plan to supporting local / cultural distinctiveness including the Welsh language in the Plan. This would recognise the strong growth in the Welsh language taught at schools especially in South Wales.
14. Welsh Government's Glastir agri-environment scheme is an important tool in seeking to enhance the environmental goods and services provided by agricultural holdings throughout Wales and should be referenced in the Plan (see specific comment below). It is worth noting also that a review of the scheme is coming up and the new Rural Development Plan under which it is funded will be out to consultation in the near future.
15. We feel that reference needs to be made to the importance of all adopting biosecurity measures to help prevent the spread of both pests and diseases as well as invasive plant species. We recognise that this is mentioned in the charter for residents and visitors under section 12.2 but not elsewhere and there would be benefit of doing so..
16. In the same vein it may be useful to note that Forest Design Plans are becoming Forest Resource Plans but the transition is at an early stage.
17. Many AONB's have received EUROPARC's Sustainable Tourism Charter. Would this add potentially any value to the Wye Valley's excellent tourist destination planning? If so it would probably be worth referencing.
18. A small point of accuracy is that the Plan needs to be re-checked for incorrect references to Forestry Commission and Environment Agency in Wales, as well as Welsh Assembly Government (now Welsh Government).

## **Specific Comments**

### **1.1.2**

It would be worth recognising the fact that, in addition to being a challenge, the cross-border nature of the AONB does also present a strength in the range and experience that the various partners are able to bring to the management of this internationally important landscape designation.

### **1.3**

In our view this section should be moved up to the start of the introduction.

Action Plan – Is it intended that the action plan be made available alongside the management plan as the action plan has an important relationship with the strategic objectives? (Refer to comments under point 11 above). We consider that the action plan is the opportunity to be sufficiently SMART to deliver the strategic objectives.

Under this section we would also advise that a summary is included to give the reader a feel for the main changes between this version and the previous plan (Refer to comments under point 10 above).

### **3.2.5**

There should be more emphasis here on the fact that the threat from pests and diseases is high as opposed to just having potential to affect woodland within the Wye Valley. In particular, *Phytophthora ramorum* is significantly affecting larch plantations across Wales and will have implications for the clear felling of larch trees in the Wye Valley. This will have a consequent effect on the landscape (through clear felling larch sites under tree health notices). It is worth noting that the effect of *Phytophthora ramorum* can also be viewed as positive in that it will help to achieve restoration of Planted Ancient Woodlands (PAWS) areas back to broadleaves quicker (although not through the preferred method of continual thinning). The areas not designated as PAWS are likely to support mixed conifers /broadleaves so as not to have a

monoculture of trees and this will benefit tree health and wider conservation including protected species.

### **3.3.3**

With reference to salmon stocks in the River Wye we consider that there would be merit in stating that significant habitat improvements to spawning grounds have been undertaken to help reserve the decline in stocks and that it is hoped that this will benefit the River's future salmon population.

### **5.4.8**

We note that reference to the water Framework Directive in the Plan. However we feel that this needs further explanation and acknowledgement.

This Directive is the most substantial piece of water legislation from the EC to date. It requires all inland and coastal water bodies to reach at least "good status" by 2015. It will do this by establishing a river basin district structure within which demanding environmental objectives will be set, including ecological targets for surface waters. The Directive therefore sets a framework which should provide substantial benefits for the long term sustainable management of water.

The aim of the Directive is to safeguard and improve water quality. It will do this through River Basin Management Plans which will develop the links between surface and groundwater, and water quantity and water quality. The Environment Agency and Natural Resources Wales are the lead agencies for ensuring that the Directive is implemented.

AONB management plans should recognise the importance of the water environment and articulate the steps that will be taken within the AONB to meet Water Framework Directive objectives, encouraging appropriate partnerships and action in priority catchments.

It is noted that reference is made to poor ecological status due to diffuse pollution under Section 8.2.2 of the Plan. However, we feel that further consideration should be given to the inclusion of what partnerships and actions are planned to tackle diffuse pollution (also refer to comments in respect of Table 8 below).

### **6.2.1**

Landmap – For those readers of the Plan not familiar with Landmap we consider that there should be an explanation of the classification process probably included as part of a glossary to the plan.

Also under this section we consider that there would be benefit in updating the Plan to refer to the emerging Local Development Plan for Monmouthshire (this is due to be adopted by the end of March 2014).

### **Table 8**

We note the deletion of reference to air, soil and water quality, These are important parameters for a healthy functioning landscape and underpin the Ecosystems Approach. Therefore we strongly urge that consideration needs to be given how the Plan will address these elements within the objectives of the Plan.

## **Part 2 Strategy**

### **Introduction**

Change required; should refer to 2014-2019 plan rather than 2009 – 2014.

#### **7.1.6**

Is the reference to “charter” appropriate? Would it be better to title this simply as, ‘What you can do to help support the AONB’?

#### **8.1.4**

In the last sentence, in addition to halting decline we would advise that actions should help to reserve declines where appropriate.

#### **8.2.1**

Replace “River Severn SAC” with Severn Estuary SAC”.

#### **8.5**

Include reference to Glastir Agri-Environment Scheme in Wales – Entry Level, Advanced, Woodland Management and Creation Glastir Schemes.

#### **8.6.2**

Insert reference to larch as one of the tree species affected by Phytophthora ramorum.

#### **8.6.7**

We would advise that rather than saying “wherever possible woodlands need to be brought back into management”, it would be better to say woodland owners should be encouraged to undertake active and appropriate management of their sites including the use of coppice management.

#### **8.6.7.**

Reference to “The right tree in the right place”, should be expanded to refer to the need to use the native species and give consideration to local provenance of those species.

#### **12.2.6**

There are probably 2 issues covered here which need to be separated. The maintenance of the rural nature of land although linked to wildlife conservation is important in its own right in terms of landscape character and should be included as a separate action in addition to managing land for wildlife.