



**Bryniau Clwyd a
Dyffryn Dyfrdwy**
Clwydian Range
and Dee Valley

Ardal o Harddwch Naturiol Eithriadol
Area of Outstanding Natural Beauty

Clwydian Range and Dee Valley AONB Management Plan

Consultation Report November 2015



Consultee	Comment	CRDV Response
Canal and River Trust	<p>Page 2. INTRODUCTION. 2nd Paragraph. The introduction should acknowledge the importance of the Pontcysyllte Aqueduct and Canal World Heritage Site and its impact on the landscape <i>"...lies the glorious Dee Valley with historic Llangollen, a famous market town rich in cultural and industrial heritage including the Pontcysyllte Aqueduct and Llangollen Canal, a designated World Heritage Site.</i></p>	Adopted
	<p>Page 2. About this plan. 2nd Paragraph It is considered that this should also include reference to all potential stakeholders or custodians of land or key features within the AONB who will have a key role to play in delivering the plans aspirations.</p>	Adopted
	<p>Page 2. About this plan. 3rd Paragraph We welcome the change of approach reflected in the statement 'This Management Plan is different from its predecessors in that it also begins to tackle the question of what the AONB can produce to meet society's needs whilst ensuring the achievement of AONB's purposes to conserve and enhance natural beauty.'</p>	Noted
	<p>Page 3. Para 1.1 The acknowledgement given to the influence of physical human shaping on the landscape is welcomed. The canal and aqueduct, whilst manmade features, make a significant contribution to both the quality and character of the landscape.</p>	Noted
	<p>Page 3. Para 1.2 We welcome the acknowledgement that it is not the purpose of the designation to stop development where this does not unduly harm the character and appearance of the AONB.</p>	Noted
	<p>Page 3. Para 1.3 As owners of the Llangollen canal and a number of associated buildings and structures the Trust welcomes the undertaking to work with landowners and recognition of the key role they have in realising the overall vision for the area.</p>	Noted
	<p>Page 5. Section Two – European Context. In terms of setting the Plan in context, reference could be given to the World Heritage Site designation and some background information provided to explain</p>	Adopted
	<p>Page 6. Para 2.5 River Basin Management plans The River Dee Basin Management plan also references the Llangollen Canal which could be referenced in this paragraph.</p>	Reference made to the importance of the canal as a water body in Habitats and Wildlife, River Valleys and in the Regulating Services Section
	<p>Page 8. Table. Regulating Services Column: Water and Flood Regulation. This should include reference to the canal but with the following caveat/footnote to put</p>	Adopted

	the Trusts flood management responsibilities in context.	
	Page 8. Table. Regulating Services Column: Water and Flood Regulation. This should include reference to the canal but with the following caveat/footnote to put the Trusts flood management responsibilities in context.	Adopted
	Access Recreation and Tourism We welcome the recognition given to the Pontcycyllte Aqueduct as an iconic visitor and cultural attraction and its importance as a visitor attraction. The Trust feels however that recognition should also be given to the role played by the Llangollen canal in providing access into the AONB and wider linkages and access.	Adopted
	PolSQ1. Conserve and enhance the Special Qualities and distinctive character of the AONB's landscape and associated features <i>including the historical built form.</i>	Adopted
	Page 14 Habitats and Wildlife and Page 17 River Valleys could usefully contain references to the role of the canal corridor e.g. under Special Features on p14 add Llangollen Canal to 'River Valleys and the River Dee' bullet point.	Adopted
	Page 16 -17 section re woodland – suggest that this section needs to acknowledge that achievement of other policies in the strategy may require careful removal of some trees (e.g. for parkland restoration and re-establishing views to and from WHS) therefore suggest that the following is added at the end of WVTO1 '...having regard to the other policies in the management strategy'	Adopted
	PolHE3 amended to include reference to "enhancement" consistent with PolHE1 ie. "Ensure that the World Heritage Site is conserved and enhanced in the context of it's setting within the AONB."	Adopted
	WHSO2 – Some key views have already been lost through construction and/or lack of maintenance and it is suggested that this objective is amended to 'Key views to and from the World Heritage Site and the visual and cultural setting to be identified, established and maintained consistent with the other policies in this strategy.'	Adoptd
	WHSO3 It is considered that the policy should be reworded to refer to the provision of: <i>"facilities, services and signage in appropriate locations to enhance the visitor experience and help manage the impact of visitor pressure on the historic integrity and setting of the World Heritage Site and the AONB as a whole."</i>	Adopted
	Policy WHSO4 - It would be more appropriate to refer to ensuring a "consistent or complementary " approach to signage	Adopted

	<p>New Policy The Trust would like to see the addition of a new policy, reflecting what it believes is a shared aspiration for the World Heritage Site, referencing the promotion and sympathetic enhancement of the WHS and the creation of a quality visitor experience to encourage visitors to stay longer in the area with resulting economic benefits which can be used to assist in maintaining key features of the area.</p> <p>Suggested new policy wording and supporting objective ☑ <i>Policy: “To promote and secure the sympathetic enhancement of the World Heritage Site, its facilities and setting, to create a high quality visitor experience, having regard to the other policies in this management strategy”</i></p>	Adopted
Paul Day	Whilst I accept the plans relates to the now extended AONB only, I would wish to make the observation that the now extended AONB boundary does not still equate with that recommended by Hobhouse as most of the Berwyn Mountain massif and the Ceiriog valley is still not included. I would hope that within the plan period work could be undertaken to promote this extension, An enlarged site would also help achieve many of the ecosystem objectives of the plan	This is beyond the remit of the Management Plan. The plan relates to the special features within the area designated AONB.
	Mention should be made of geodiversity within the document. Whilst there is reference to geological SSSI there are a number of regionally important geological sites (RIGS) within the AONB which form an important geological/teaching resource which help to explain what we see today	Adopted
	Glastir could usefully be included in this section where appropriate-it is mentioned in The Historic Environment	The potential for Glastir to deliver biodiversity objectives is referenced in the Action Plan
	Perhaps Pavement and Caves should be added to the Limestone Grassland It would be advantageous if all limestone pavements could be recorded and mapped within the AONB with a view to placing Limestone Pavement Orders on them eventually	Caves and pavement are referenced in the action plan – Further emphasis is now made in the Strategy.
	In relation to Big Covert Wood I also remain concerned about the piecemeal development which appears to be occurring therein following its sale in parcels, I would like to see the promotion of amendments to existing planning legislation to control the type of activities currently occurring therein.	Noted.
	Are listed buildings specifically encompassed within the Historic Environment section?	No – Objectives relating to Listed Building and the Buildings at Risk Register are also to be found in the Built Environment Section

	I would like to see a statement that all existing PROW will be maintained open and usable. I would also seek a statement to the effect that whenever possible furniture along existing PROW will be as user friendly as possible-the use of kissing gates rather than stiles is clearly preferable for all and especially the disabled and dog walkers.	ODP01 calls for the continuous improvement of Rights of Way within the AONB ODP05 calls for the removal of psychological and physical barriers to access.
Denbighshire County Council Lara Griffiths	Page 11 – under Culture and People feel it would be appropriate to include a reference to the Welsh language as a special feature of the AONB. Similarly under Objectives LQCO6 and 7 feel that reference to welsh language should be included	Policy PolSQ4 has specific reference to the safeguarding of the Welsh Language. This will be reflected in LQC07
	Page 18 – there is no mention of listed buildings or conservation areas under special features, feel that this is an important omission and would wish to see them included in the final document.	Listed Buildings and Conservation areas are referenced under the built Environment and have specific Objects and actions relating to them.
	PolHE2 – would recommend that the AONB Partnership work with Menter Iaith to increase understanding of cultural aspects of the historic environment.	Adopted – Actions within the Landscape Quality and Sustainable communities to work with Menter Iaith to support the Welsh language
	Page 23 – people and communities, language should be referenced here. The adopted SPG on Planning and the Welsh Language makes specific reference to the need to retain existing place and house names to reinforce local identity.	Noted and adopted – within Action Plan
	State of the AONB report Page 7 Issues – should be looking to enhance as well as sustain the Welsh language.	Noted
	Action Plan Page 1 – LQCO3 – renewable energy guidance. The Council is currently preparing an SPG on renewable energy with a view to going out to consultation later in the year. This may meet the action proposed here.	Noted
	LQCO7 – would like to see Menter Iaith Clwyd included as a partner here.	Adopted
	Page 17 – support the offer of member training and CPD for officers. Page 19 – support PCO1 to resist the loss of community facilities, this is mirrored in the LDP.	Noted

CPRW – Clwyd Branch	Reference to the challenges ahead in address demands for renewable forms of energy and in particular transmission lines that will be associated with this. Concern expressed in the potential impact on the landscape of renewable energy schemes and power transmission from other large power stations currently in development.	Noted
NFU	The ‘governance’ arrangements for the proposed AONB are hugely important but don’t appear to be mentioned in any detail. They need to include people who are representative of the rural economy. Agriculture is the largest land user in an AONB but rarely is it adequately represented.	Noted and adopted. The new governance structures for the AONB will appear in the final document
Wrexham County Borough Council	The sentence states that this is the first overarching 5 year strategy, giving the impression that there are other documents that sit with this?	Adopted
	AONB unit – who are they, is there a reference somewhere on the website perhaps which could be referenced in a footnote to explain to the reader who they are	Adopted – the final Plan will include a diagram relating to the governance structure of the AONB
	It would be worth mentioning the JAC role in respect of how planning applications are dealt with and the role that they have in the planning process overall in protecting the character and appearance of the AONB	Adopted – As above – the Governance Structures and role of the Partnership / Joint Committee will be illustrated in the final plan
	International Union for the convention of nature and natural resources – category v landscapes	Adopted – IUCN and Category V revised.
	A link and paragraph to the emerging planning and heritage bill would be useful in here to highlight those functions of AONB management and link with the JAC. Suggest it would also be of use to reference the Wellbeing of Future Generations Act in here too which embeds sustainability into the decision making process, something which is relevant to the continued management of the AONB. Reference to national planning policy on AONB’s (chapter 5 of Planning Policy Wales (edition7, 2014): Conserving the Natural Heritage and the Coast) would also be useful and would help to reiterate the role of the JAC in the management of the AONB.	Adopted.
	Make reference to Local Development Strategies and Planning Policy	Adopted
NRW	Who is the Plan for ... Many people benefit from the AONB even if remote from it and these include the many users from beyond the boundary. To reflect the inclusive consultation we	Adopted

	suggest that 'users of' or 'visitors to' the Area is added to this section.	
	1.4 Governance NRW welcomes the creation of the AONB Joint Committee in 2014 and appreciates the importance and value of the AONB Partnership in supporting the delivery of the AONB Management Plan through its experience and expertise.	Noted
	Section 2 Ideally this section should contain a distillation of the main current policy influences beyond the Environment Bill. The Wellbeing of Future Generations Act, Planning Bill, Historic Environment Bill as well as Sectoral Adaptation Plans for climate change should be considered here as well as an analysis of their impact on future management of the AONB.	Adopted
	If reference is made to the Environment Bill, further information should be provided in terms of potential changes the Bill expects to present to the AONB Management Plan and also timescale for passage of the Bill.	Adopted
	It would be appropriate here to discuss the output of the State of the AONB report, the forces for change and the trends in condition of the Special Qualities before setting out objectives and actions. These objectives and actions should be responding to the trends detected since the last SoAONB report.	Plan amended to reflect key issues identified
	In terms of the attractions identified under access recreation and tourism, we would suggest that reference is made to the outdoor education centres at Colomendy and Bryntisilio which have attracted generations returning to the area they visited as school children.	Adopted
	With regards to policy WVT02 we would suggest the introduction of a programme of replacing future parkland/landscape specimen trees across appropriate parts of the AONB.	Adopted within the Action Plan
	LQC01 – The Natural Response to Flood Risk Management Project for the River Clwyd Catchment could be referenced.	Adopted within the Action Plan
	LQC05 - should also identify the need to reduce visual clutter – There is an increasing need for a major project across the AONB to rationalise road traffic signage and develop a strategy with Highways and Trunk Roads Agency in line with their S85 duties.	Adopted within the Action Plan

	Cultural distinctiveness is acknowledged to include the Welsh language in the Plan and 'sustaining the Welsh language' is also an issue in the SoAONB p7. We recommend that actions be developed to address this important cultural element of the AONB.	Adopted within Strategy and Action Plan.
	HMR01 – NRW should be referenced as lead partners in relation to WG land at Coed Nercwys and Coed Moel Famau.	Amended
	LGP01, LPG02, LPG03 and LPG04 – NRW should be referenced as partners through designated conservation sites and the Limestone Legacy Scheme.	Amended
	WVT01, WVT02 and WVT03 - NRW should be referenced as partners.	Amended
	NWWT and the Dee INNS project should be referenced as partners.	Amended
	WHS01 – With regards to World Heritage Sites - WHS Board / Steering Group should lead on this aspect of the Plan.	Amended