

North York Moors National Park Authority National Park Authority Meeting

3 October 2016

Management Plan Review

1. Purpose of the Report

- 1.1 To inform Members of the responses to the National Park Management Plan review.
- 1.2 To propose an initial approach to how each is dealt with to be incorporated in the Plan review if required.

2. Introduction

- 2.1 The National Park Management Plan for the North York Moors was completely reviewed in 2011 and a new Plan – “A Wider View” was adopted by the Authority in November 2012. This can be viewed on our website at:
<http://www.northyorkmoors.org.uk/shared-publications/Final-Plan-26.11.12.pdf>
- 2.2 The Management Plan sets out the vision and objectives for the future management of the National Park and how National Park purposes will be delivered over the Plan period.
- 2.3 Although the Plan covers a 15 year period, National Park Management Plans have to be ‘reviewed’ on a five yearly basis to take account of any changes in circumstances, pressures or opportunities facing the National Park. The Management Plan is approaching its fifth year next year in 2017.
- 2.4 A light touch refresh was agreed by Members at the National Park Authority Meeting in March 2016, subject to comments from stakeholders.
- 2.5 The Authority has carried out its consultation with key stakeholders which ran from 14 June to 19 August 2016. A list of those consulted can be found at **Appendix 1**. In conjunction, the Authority has also undertaken the Residents’ Survey and Visitor Survey which asked what issues people felt are affecting the National Park and what should priorities be looking forward, which will feed into the review process. These surveys elicited responses from over 1,000 respondents. The review has also been mentioned at the Parish Forums and in the Annual Report.

3. Stakeholder Consultation Responses

- 3.1 A total of ten stakeholders responded to the consultation and a full precis of the comments received and the proposed Authority response can be seen at **Appendix 2**. Although the response rate to the consultation is relatively low, officers consider that this endorses the ‘light touch’ approach taken as few issues were raised. This reflects the comprehensive nature and relatively recent adoption of the Plan.
- 3.2 Several respondees have raised the issue of uncertainty around agricultural policy, particularly agri-environment schemes, in the light of Brexit. This is an issue for immediate action and is addressed in the Business Plan. Officers believe the policies in the existing Management Plan give a clear description of the outcomes which need to be achieved by UK based delivery mechanisms and regulation.

- 3.3 Natural England has made many useful comments without proposing any fundamental changes and recognises it as a 'substantial and good' Plan. Specific updates, clarifications and strengthening are requested relating to Landscape, Conservation and Joint Action Plans, coastal matters, sea trout, Marine Plan, Geopark status, and status of key partners which can all be helpfully and easily accommodated in the Plan and in some instances further detail will flow from the Authority's new Business Plan and resulting partnership working. Tree disease has also been mentioned by the Forestry Commission and officers believe it should be specifically referred to in the Plan.
- 3.4 Several of Natural England's comments relate to strengthening the coverage of Natural Capital and ecosystem services in the Plan. This should be an ambition for the next full review when the methodologies are better advanced, but extensive work on this area at the time of the last review revealed the limitations of quantified approaches over an area the size of a National Park. The one specific area suggested for inclusion (recreation opportunities/health benefits) is in fact already mentioned, though the complexities of trying to quantify the value of this factor alone are enormous.
- 3.5 The Forestry Commission has expressed its agreement that a light touch review is appropriate. It has raised concern about the rate of woodland creation, essentially expressing support for existing or enhanced targets and suggesting specific reference is made to the potential role of trees in flood mitigation.
- 3.6 The major threat to trees from disease is cited as deserving specific mention. Given the potential huge impact of disease in Ash on the National Park's landscape and ecology and the significance of disease in larch for re-planting programmes officers agree that this should be accepted.
- 3.7 In terms of joint working with the Commission on conservation subjects (which are covered by a bilateral accord) officers would propose that the priorities are restoration of ancient woodland features (which are still being lost), appropriate woodland planting and work on tree disease.
- 3.8 The RSPB has raised important issues about intensification of grouse moor management, associated infrastructure and burning patterns and persecution of raptors. The Management Plan only supports new infrastructure for grouse shooting where this has no adverse impact on the environment. The Authority has control over significant infrastructure through its role as planning authority. Recent cases have demonstrated the Authority's commitment to protecting moorland from harmful development through planning refusals. Officers have sought further comments from the RSPB on their views regarding moorland management and Members will be updated accordingly.
- 3.9 On burning, the Management Plan is clear that too frequent or poorly managed burning is damaging, and supports areas of 'no burn' or longer rotation burns. It also covers illegal persecution of protected species (which is not confined to birds) and commits the Authority to continue supporting the enforcement agencies in action against these crimes. Officers are not therefore proposing changes to the Management Plan text on these subjects **but** do believe that this is an important issue and that it is appropriate to reinvigorate the support mentioned above. This will be covered in more detail in the Business Plan.
- 3.10 The RSPB also raised issues about Merlin and Nightjar, proposed responses are in **Appendix 2**.

- 3.11 The Scarborough Tourism Advisory Board asks what are the main tourism based targets for the next five years? Although the Management Plan has general targets for tourist activity, it does not attempt to identify specific investment needs. Nor does the Recreation and Access Strategy cover this. This is an area of work which it would be possible to undertake within this Business Plan period under the externally funded project work which has been bid for, with a view to inclusion in the forthcoming Local Plan.
- 3.12 In response to the Advisory Board's concerns relating to a decline in tourism in 2010, the picture has been very different since then and tourism has instead seen year-on-year increases in line with the aspirational figures within the Management Plan. It is acknowledged that the Authority needs to ensure the new Local Plan aligns with the Management Plan by ensuring policies are in place to enable the National Park to *appropriately* attract and accommodate visitors. Tourism also forms part of the Defra National Parks 8 Point Plan which will inform the Local Plan where appropriate.
- 3.13 Most of the other comments raised by the Advisory Board are not considered to be directly relevant to the Management Plan. Thus issues relating to potash, quarrying and fracking and the Authority's approach to these developments are all being considered as part of the Minerals and Waste Joint Plan which is at the Draft Publication stage. An update on the MWJP is to be reported to Members at the upcoming Planning Committee Meeting in October.
- 3.14 Historic England are supportive of the light touch review and have no specific comments. North Yorkshire County Council has also made numerous helpful comments none of which would suggest the need for a more fundamental review.

4. Residents Survey Conclusions

- 4.1 These are analysed in the separate paper on this survey. The findings will be incorporated into the next Management Plan review paper to Members in December as well as informing the development of the Local Plan.

5. Visitor Survey Conclusions

- 5.1 The results of key questions from this survey show that progress on Management Plan targets relating to awareness and understanding has been excellent. Figures for the survey (restricted to the same 3 locations surveyed previously) show that 84% of respondents were aware that they were in a National Park during the 2016 survey compared to 73% in 2011 and 34% could name more than three of our identified special qualities compared to 18% during the last survey. When asked (unprompted) to name National Parks in the North of England, 92% named the North York Moors compared to 34% in 2011. A full analysis of the survey results will be presented to members at the next meeting.

6. Conclusion

- 6.1 At this stage, Members are asked to note the consultation representations received and consider the suggested responses by officers, some of which will require changes and new text to be incorporated in the review document, to be agreed at the Authority meeting in December. We will also carry out a final check of progress against Management Plan indicators and also report results to Members in December.

7. **Financial and Staffing Implications**

- 7.1 The review of the Plan has been prepared at a corporate level, coordinated by the Policy and Strategy Team. Any implications arising from any changes or additional work required will be planned and resourced in the 2017/2020 Business Plan.

8. **Contribution to the National Park Management Plan**

- 8.1 Directly, as consultee responses will be incorporated in the Review of the current plan as considered necessary in each case.

9. **Legal Implications**

- 9.1 Section 66(4) of the 1995 Environment Act requires National Park Authorities to review its National Park Management Plan at intervals of not more than five years. This “refresh” of the existing Management Plan “A Wider View” fulfils that legal requirement.

10. **Recommendation**

- 10.1 That Members note the consultation representations received to the first review of the Management Plan “A Wider View” and endorse the suggested actions/responses to them in Annex 1, which will form the basis of revised text where required, to be agreed in at the December NPA meeting.

Contact Officers:

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Management Plan consultees

Constituent Local Authorities

Ryedale District Council
 Ryedale Strategic Partnership
 Scarborough Borough Council
 North York Coast Community Partnership
 Hambleton District Council
 Hambleton Strategic Partnership
 Redcar and Cleveland Borough Council
 Redcar and Cleveland Strategic Partnership
 North Yorkshire County Council
 North Yorkshire County Council - Forward Planning
 North Yorkshire County Council - Highways
 Redcar and Cleveland Highways

Central Government and Statutory Authorities

DEFRA - Environment
 Dept Communities and Local Government
 Environment Agency
 Natural England
 Forestry Commission
 English Heritage
 Highways Agency
 The Arts Council
 Marine Management Organisation
 The Coal Authority
 North Yorkshire Police
 Cleveland Police
 North Yorkshire Fire and Rescue Service
 Cleveland Fire Brigade
 Scarborough and Ryedale Mountain Rescue Team
 Cleveland Search and Rescue
 York and North Yorkshire LEP
 Homes and Communities Agency
 North Yorkshire LEA
 Middlesbrough LEA
 Tees Valley Unlimited

Other National Parks in England/ AONB

Broads Authority
 Dartmoor NPA
 Exmoor NPA
 Lake District NPA
 New Forest NPA
 Northumberland NPA
 Peak District NPA

South Downs NPA
 Yorkshire Dales NPA
 National Parks England
 Europarc - Atlantic Isles
 Howardian Hills Area of Outstanding Natural Beauty

Estates/ Landowners

Baysdale Estate
 Grinkle Park Estate
 Skelton and Gilling Estates
 Spaunton Estate and Goathland
 Hawaby Estate and Arden Moor
 Rosedale and Westerdale
 Snilesworth Moor
 Duncombe Park Estate
 Hackness Estate
 Urra Estate
 Egton Bridge Estate
 Mulgrave Estate
 Wykeham Estate
 Duchy of Lancaster
 Ravenswick Estate
 Strickland Estate
 Guisborough Estate and Farndale
 Kildale
 Kewwick
 Thimbleby
 Bransdale
 Fylingdales Moor
 Ministry of Defence Estates
 Wheeldale Moor and Goathland West Moor
 Camphill Village Trust
 The National Trust
 The National Trust
 The Church Commissioners
 Ampleforth College

Business/ Farming Interests

National Farmers Union
 EBLEX
 Country Land and Business Association
 Forestry and Timber Association
 National Gamekeepers Organisation
 Esk Valley Railway Development Company
 North Yorkshire Moors Railway
 Cleveland Potash
 Yorwoods

North Yorkshire TEC
Tees Valley TEC
Business Link York and North Yorkshire
STEAM
Farmoor Services
Thimbleby Farms
Leeds York and North Yorkshire Chamber of Commerce
Ryedale Folk Museum

Utilities providers

Yorkshire Water
Northumbrian Water
Northern Powergrid
Northern Gas Networks
BT - Openreach
Mobile Operators Association

Specialists and Interest Groups

North Yorkshire Moors Association
Rural Action Yorkshire
Tees Valley Rural Community Council
Ryedale, Scarborough and Whitby Rural Transport
and Access Partnership
Esk Valley Community Energy Group
Energy Savings Trust
North Yorkshire and Cleveland Coastal Forum
Moorland Association
Tees Valley RIGS Group
North East Yorkshire Geology Trust
Yorkshire Geological Society
North Yorkshire Geodiversity Partnership
Yorkshire Peat Partnership
The Heather Trust
Yorkshire Dry Stone Walling Guild
The Woodland Trust
The Tree Council
Royal Forestry Society
RSPB Yorkshire
Farming and Wildlife Advisory Group
Yorkshire Wildlife Trust, Moors and Vales Region
Tees Valley Wildlife Trust
Game & Wildlife Conservation Trust
Yorkshire Naturalists Union
Black Faced Sheep Breeders Association
Butterfly Conservation - Yorkshire Branch
Buglife - The Invertebrate Conservation Trust
The Hawk and Owl Trust
The Salmon and Trout Association
The Landscape Research Centre

Askham Bryan College
CPRE - North Yorkshire
York and Ryedale Friends of the Earth
Yorkshire Archaeological Society
Helmsley Archaeological and Historical Society
Tees Archaeology
Council for British Archaeology (in York)
Society for the Protection of Ancient Buildings
Ancient Monuments Society
York Georgian Society
The Victorian Society
The 20th Century Society
Byways and Bridleways Trust
Upland Path Trust
PLACE
Middlesbrough Environmental Education Specialist
Working Group
Scarborough Museums Trust
Whitby Museum
The Yorkshire Museum
York and North Yorkshire Creative Industries Network
Open Spaces Society

User Groups

Welcome to Yorkshire
Coastal Tourism Advisory Group
Ryedale Tourism Advisory Group
British Horse Society
Ramblers Association
Cyclists Touring Club
Camping and Caravanning Club
Duke of Edinburgh's Award
Peat Rigg Outdoor Training Centre
East Barnby Outdoor Education Centre
Great Fryupdale Outdoor Centre
Youth Hostel Association
Lyke Wake Company
New Lyke Wake Club
North Yorkshire Sport
Sport England
RAC Motorsport Assoc
Yorkshire Federation of Young Farmers' Clubs
British Association for Shooting & Conservation
British Mountaineering Council
Canoe England
British Trust for Conservation Volunteers
North York Moors Ridge Soaring Club
The Yorkshire Gliding Club

NYMNP Disability Advisory Group
Whitby and District Disablement Action Group
The Scout Association
The Women's Institute - North Yorkshire East Federation
Future Years
Northdale Horticulture
Age UK (Scarborough)

Residents/ Residents Groups

Mr Clive A Proctor
Robin Hood's Bay and Fylingdales Village Trust
Runswick Bay Association
Scalby Village Trust
The Osmotherley Society

Area/ Local Access Forum Chairmen

Coastal Forum
Northern Forum
Southern Forum
Western Forum
Local Access Forum

District Council Leaders and Councillors with wards in the National Park

Ryedale - Leader

Ampleforth
Cropton
Dales
Helmsley
Kirkbymoorside
Pickering
Sinnington
Thornton Le Dale

Scarborough - Leader

Danby
Fylingdales
Scalby
Esk Valley
Mulgrave
Derwent Valley

Hambleton - Leader

Broughton and Greenhow
Great Ayton
Osmotherley
Swainby
Whitstonecliffe
White Horse

Redcar and Cleveland - Leader

Guisborough
Hutton
Lockwood
Loftus

North Yorkshire - Leader

Esk Valley
Great Ayton
Kirkbymoorside
Malton
North Hambleton
Scalby and the Coast
Seamer and Derwent Valley
Stokesley
Thornton Dale and the Wolds
Whitby Mayfield cum Mulgrave

Members of Parliament and MEPs

Ryedale
Scarborough and Whitby
Richmond
Middlesbrough South and East Cleveland
Redcar and Cleveland

Members of the European Parliament

Yorkshire and the Humber

Primary Land Users Group (not elsewhere on the list)

Mr Foster
Ms McQue
Mr Welsh
Mr Thompson
Mr Burt
Mr I McDonell

Members

Parish Councils

Libraries

Appendix 2: Responses from the key stakeholder consultation:

RESPONDENT	RESPONSE	PROPOSED AMENDMENTS
Marine Management Organisation		
References made to the Marine Policy Statement and future North East Marine Plan should be maintained. For consideration, reference to the MMO and Marine Policy Statement may want to be added under the 'Coastal Fishing' section as this falls within the remit of the MMO.	No significant changes other than referencing the MMO and Marine Policy Statement to the Coastal Fishing section of the Plan on page 97.	Page 97 (Section 4.7)...especially for crab and lobster. <i>It is therefore important that potential social and economic impacts of other developments on fishing activity is considered, as well as potential environmental impacts, in accordance with the National Marine Policy Statement In recent years...</i>
Aislaby Parish Council		
There is a need to re-look at criteria for affordable homes in light of the recent disappointment in Aislaby.	This relates to planning - Issues will be addressed through the new Local Plan and in the context of significant change introduced by the Housing and Planning Act 2016.	No change, issue will be covered in the new Local Plan
Whorlton Parish Council		
The vision and future management of the NP is largely predicated on European legislation, e.g. Habitats Directive, Bathing Water Directive, and Water Framework Directive. The Common Agricultural Policy has been significant in shaping land management practices, e.g. grazing levels to create the NPs distinctive landscape. Post Brexit, it is not clear whether this legislation is to be replaced or maintained. The NP should work in conjunction with Defra, EA and NE to ensure national measures are put in place to safeguard the Parks special qualities.	The Authority recognises that there could be significant implications for the National Park and this has been recognised in the Business Plan, however this could be added as a “challenge” in the review.	Page 82 (Section 4.2, Challenges, third bullet point) ...government grants...Delete the final sentence and replace with <i>The implications of the 2016 vote to leave the European Union may also have significant implications for farming subsidies and highlight the need for all relevant parties to monitor and help the transition.</i>
Forestry Commission		
Support a light touch review rather than a more fundamental review.		

<p><u>Areas not progressed:</u></p> <p>Key area is desired rate of woodland creation as aim is to create 3,000ha of new woodland with short term target of 300ha by 2017.</p> <p>Woodlands and forests are being increasingly recognised for their natural capital benefits and therefore both the ambition and actual progress should be reviewed with fresh targets and clear delivery model (example provided). Useful to review progress on restoration of ancient woodlands given their prominence within the Plan whilst recognising need to work with landowners to ensure land management is sustainable and resilient.</p>	<p>This target needs clarification.</p> <p>Recent planting in North York Moors has been above national average (but which of this parkland planting). Agreed that delivery model needs consideration along with short term targets: these should be in Business Plan.</p> <p>We need to examine where there could be growth of good quality timber on better quality land than at present (i.e. on improved grassland rather than limiting to bracken banks). We need to ensure sites benefit commercial interests <u>and</u> improve biodiversity.</p>	<p>Amendment to text to state 300ha of native woodland (page 52 and page 55).</p> <p>To be considered as part of the Business Plan.</p>
<p><u>Gaps:</u></p> <p>Importance of natural flood management and role of trees and woodland is not fully recognised.</p> <p>Also the challenges associated with woodland resilience and the impact of pest and disease.</p>	<p>Agreed. There are parts of the National Park where planting trees would help with reducing run-off but we need to recognise the role of the right types of forestry and investigate opportunities. In the meantime the need to reduce the risk of flooding is covered at Policy E44. Slowing the Flow at Pickering and similar projects are also mentioned.</p> <p>The tree disease problem should be more fully mentioned.</p>	<p>No change</p> <p>Page 88, add a further bullet point “<i>There is a risk that pests and disease can and could lead to damage and loss of trees</i>”.</p>
<p><u>Joint working for next 3 years:</u></p> <p>To work with the Park to protect, improve and expand woodland resource, such as working with landowners to address challenges of pests and disease, increase level of active woodland management, significantly increase woodland creation levels and help to restore and connect</p>	<p>This joint working area is welcomed and detail will be included in the Business Plan</p>	<p>None, this will be covered in the Business Plan</p>

ancient woodlands.		
Historic England		
No comments to make at this stage.	No further action needed, though need to ensure name change is enacted.	Change 'English Heritage to ' <i>Historic England</i> ' in section 1.9 (page 17), section 2.1 (page 22), section 2.2 (pages 26- 28), the table on page 49, and section 3.4 (page 73),
RSPB		
<p>The RSPB has serious concerns about the following issues which we believe should be addressed as a matter of conservation priority:</p> <ul style="list-style-type: none"> • Unsustainable management and damage to designated moorland from inappropriate burning. Intensification of moorland management inc. pressure on protected sites from additional grouse management; • Illegal persecution of birds of prey, inc. SSSI citation species; • A decline in Merlin; • Uncertainty around agricultural policy and agri-environment schemes and the potential implications for farmland birds; 	<p>The Management Plan deals with these issues with policies designed to achieve suggested results. We have responded to seek further views.</p> <p>Wildlife crime is mentioned in the Plan (on page. 32) but we acknowledge the need to ensure the Business Plan has appropriate action on this issue.</p> <p>Merlin is already a key indicator in the Plan and the data on declining numbers comes from volunteers. Further work is certainly needed on causes of this before actions can be established, decline possibly due to climate change effects causing shift northwards. Continued support for Merlin fieldworkers is necessary. Specific actions for the Authority should be included in the new Business Plan and discussions held with partners on this issue, including the RSPB.</p> <p>The Authority recognises that there could be huge implications for the National Park and this has been recognised in the Business Plan. This could be added as a "challenge" in the Management Plan.</p>	<p>No change at present, but we will liaise with the RSPB to seek further views. Any subsequent changes will then be taken forward in a future review.</p> <p>No change, however this is an important issue which will be taken forward in the Business Plan. We will also look to re-invigorate our support for the enforcement agencies.</p> <p>No change, we recognise the issue and this will be taken forward in the Business Plan.</p> <p>Page 82 (Section 4.2), Challenges, third bullet point) ...government grants...Delete the final sentence and replace with <i>The implications of the 2016 vote to leave the European Union may also have significant</i></p>

		<i>implications for farming subsidies and highlight the need for all relevant parties to monitor and help the transition.</i>
<ul style="list-style-type: none"> Maintenance and protection of the internationally important NYM Nightjar population. 	We will raise this issue with Natural England as the designating body and discuss forestry rotations with Forestry Commission. The National Park Authority has recently won a planning appeal on the basis of possible nightjar disturbance; we need to maintain appropriate attention to protected species in planning and other work. This is covered by existing Management Plan (and Local Plan) policies.	No change, but the issue will be raised with Natural England and the Forestry Commission.
Scarborough Tourism Advisory Board		
Acknowledge importance and focus of wildlife and tranquillity but there needs to be more information on the industrial dimension, i.e. fracking, potash and details about the key elements which will impact on the Park. In the last Plan Boulby and RAF Fylingdales were mentioned under 'Local Business'.	Importance of Boulby and RAF Fylingdales as key employers in the National Park fully recognised in current Plan. Planning policy issues being address through the Minerals and Waste Joint Plan. We have offered to arrange a meeting to discuss in more detail if desired.	No change
The Park restricts quarrying and therefore aggregates needed for the Potash development will have to be transported in from further afield. The Park should be using its own mineral resources, inc. oil and gas and quarrying.	Issues are being addressed through the Minerals and Waste Joint Plan and offered to arrange a meeting to discuss in more detail if desired.	No change
Decline in tourism in 2010 was a direct result of Park policies. Need to ensure that we continue to attract visitors and promote the great attractions / features across the area.	We are not clear what this claim refers to. Since 2012 there have been incremental year-on-year increases in visitor numbers, from 6.731 million in 2012 to 7.613 million in 2015. We do need to ensure the new Local Plan aligns with the aspirations of the Management Plan. Tourism also forms part of the National Parks 8 point plan.	No change, but policy will be developed through the Local Plan
Perception that the Park dislikes the Lyke Wake Walk and is hesitant to improve its conditions. Need more opportunities for long range walks across the Moors, north to south and east to west.	Noted. The Authority has a good working relationship with the new Lyke Wake Walk Society and recently worked to secure funding to repair and strengthen certain stretches. We also actively manage, improve and promote the Cleveland Way as well as investing in the	No change

	2000km of rights of way which cover the National Park. The Plan also already contains a policy on improvements to Rights of Way (U1) so it is not considered that any changes are needed, however we will take this point up with the Board should a meeting take place.	
Support the work done on Urra and efforts to stop motorbikes and 4x4 on Green Lanes and trods.	Noted.	No change
What are the 3 main tourism-based targets for the next 5yrs? Development of appropriate accommodation, i.e. log cabins to develop new dimensions. Mention the maze project and the Tour de Yorkshire.	Issues are to be addressed through the new Local Plan.	No change, but policy will be developed through the new Local Plan
Mulgrave Estate		
Allow greater flexibility on alteration to traditional buildings, especially regarding changes to openings which restricts the ability to make them more suitable for agricultural and other commercial uses, and also alternative building materials to help make the maintenance of buildings more economic;	Issues to be addressed through the new Local Plan.	No change, but policy will be developed through the new Local Plan
Allow afforestation and recognition of the need for supporting infrastructure;	Noted. The Management Plan already has targets for afforestation in Section 2.9. Supporting infrastructure is dealt with under planning policy.	No change.
Grant support from the National Park Authority and the Yorkshire Esk Rivers Trust to prevent soil erosion have been beneficial;	Noted	No change.
Managing coastal erosion and the provision of alternative access if existing tracks are damaged;	This is addressed through the North Yorkshire and Cleveland Coastal Forum's Coast Strategy and the Recreational Strategy,	No change.
Should encourage development of farm steadings in villages and provide greater flexibility to a variety of uses other than farm shops and offices, such as holiday and estate worker accommodation;	Issues to be addressed through the new Local Plan.	No change, but policy will be developed through the new Local Plan
A more flexible approach to managing hedge removal where they provide little ecological value;	Noted. Our approach to managing hedgerow removal is set down in law through the Hedgerows Regulations which consider both the ecological and historical value of hedgerows. Whilst we attempt to be as pragmatic as possible in managing the	No change

	process with respect to the regulations we are limited in this by the legislation.	
A more positive approach towards providing and managing proper car parking facilities for new businesses in order to avoid 'fly parking' which is unattractive and a nuisance to locals;	The issue of car parking will be looked at as part of the business planning process. It is also covered in the recreation strategy.	No change, but we will continue to liaise with other providers and landowners. The issue has also been raised and discussed at a recent Parish Forum meeting.
Need for super-fast broadband to benefit businesses;	The Management Plan recognises of the importance of broadband and some progress has been made. The Authority will continue to push this issue and deliver improvements through its planning role.	No change, but issue will be pursued through liaison with providers
More explicit recognition of the role of shooting to the local economy;	Its role is acknowledged in the Management Plan and covered by policies B16 and B18. Any additional evidence on the value of shooting would be welcomed.	No change.
Need to encourage young people to stay and work in the NP and therefore a positive approach to small scale developments at the edge of villages for both market and affordable homes, as well as estate / countryside worker accommodation;	Issues will be addressed through the new Local Plan.	No change, but policy will be developed through the new Local Plan
The Estate is working up its Strategic Plan for the next 15yrs and would be keen to meet Officers and Chairman of the Authority to discuss how shared ambitions can be achieved.	This is welcomed and will be actioned	No change, but an invitation to meet will be made.
NYCC Highways		
NYCC will continue to prioritise road safety across the county.	Noted	No change.
Consideration to the impact of installing signs and other infrastructure in the highway given NPs.	Acknowledged and will be actioned through close liaison with NYCC on signing proposals	No change.
LTP4 acknowledges need to minimise impact of traffic and the environment by providing minor highway improvement schemes to reduce congestion and promote sustainable and environmentally friendly forms of transport, including provision for ultra-low-emission vehicles. Where appropriate more environmentally alternatives to the private car will be supported but recognise the private car is likely to remain the only means of transport for many.	Noted	No change.

Exploration of external funding to promote sustainable travel choices including safe cycling and walking routes. NYCC to produce design guidance on minimising the impacts of highway improvements or replacement infrastructure.	This approach is supported	No change.
Bus services will be prioritised to meet the day to day transport needs of local communities. Community transport will be considered where it contributes to our overall objectives. Consideration of duties on whether the commercial network caters sufficiently for elderly and disabled members and whether there is a need to procure additional services.	Noted	No change.
Highlight planned changes on the Esk Valley Railway and all year round Sunday service and doubling of train service. We would hope that the NYMNPA will work with the rail industry and partners on ways to promote and support the additional services.	Noted	No change.
Continue working through NY Timber Freight Quality Partnership to meet aims.	Noted	No change.
Request amendment on the management of green lanes from "in all other cases, the Highways Authority will act" to "other cases will be passed to the Highways Authority for action".	Noted.	An amendment will be made.
The NYMNPA may wish to consider adding planning conditions to ensure new developments seek to install superfast broadband.	To consider as part of the new Local Plan.	No change, but policy will be developed through the new Local Plan.
More emphasis on sustainable tourism as a visitor product experience in its own right. Seasonality remains an issue - products can be developed that exploit the natural attractiveness of the Park in winter and autumn, thereby enabling a more sustainable and dispersed influx of visitors through the year.	Agreed. This is already being tackled through our wider work on promoting the North York Moors including through the Coastal Communities Fund project, our work with the businesses of the North York Moors Tourism Network, our assistance through the Tourism and Local Distinctiveness Fund and our work with other tourism agencies and organisations.	No change, but we remain keen to work with the County Council and other organisations on this issue.
Food and more could be made of the NYM brand; a revised plan should recognise potential of the upland and lowland farming, game, fishing, heather honey, beer etc.	Agreed, as above... This issue is also being pursued through initiatives such as the 'Capital of Cake'.	No change.
Business support elements are still sound. Farming and timber industries may develop further and perhaps low level sustainable energy generation should be considered.	Noted	No change, but policy will be developed through the new Local Plan

The revised plan will need to reference York Potash mine and recognise the opportunity for employment and the need to provide appropriate skills and housing for workers.	To be considered as part of the new Local Plan.	No change, but policy will be developed through the new Local Plan
NYCC Stronger Communities would be interested in exploring opportunities for future joint working with the Park and Parishes on issues of mutual interest, e.g. loneliness and isolation, volunteering etc.	This is already taking place	No change
NYCC would be interested in sharing good practice and explore potential for joint recruitment and training.	Noted and welcomed	No change
NYCC Stronger Communities are interested in supporting social enterprise and community shops in order to retain local services.	Noted and welcomed	No change
Howardian Hills AONB		
No major comments other than the linkages between the National Park and surrounding areas in terms of habitat connectivity and ecosystem services could be strengthened within the Plan. The NP forms an important part of strategies to manage issues on landscape scale, e.g. water level management, as well providing a potential area for species to migrate into as a result of climate change. The NPA has increasingly involved in partnership projects involving land management beyond its boundary and therefore the MP could benefit with some updating to recognise this important trend.	Importance of wider landscape partnership working and better coordination of projects across the protected landscape is acknowledged and is a part of the Authority's approach e.g. the Ryevitalise Project and Slowing the Flow.	No change, but this issue will be addressed in numerous ways in the Business Plan. We look forward to further strengthening our relationship with the AONB.
Natural England		
Natural England should be added as a delivery partner at policies E5, E10,E13, E25, E30, E42-44, E46, B16.	Welcomed and agreed.	Natural England will be added
Numerous comments requesting that references should be updated or amended: <i>Update:</i> <ul style="list-style-type: none"> • English Heritage (various sections) • The Coastal Forum (2.11) <i>Amend:</i>	Agreed.	References will be updated/amended

<ul style="list-style-type: none"> • Old trees to veteran/ancient trees 		
<p>Numerous comments that references should be added</p> <ul style="list-style-type: none"> • To the Humber River Basin Management Plan and Catchment Management Partnerships (2.10) • The <i>This Exploited Land</i> Initiative (2.2.) • Peatland Carbon sequestration benefits (2.3) • Turtledove and Nightjar (2.3) • To various Partnership initiatives such as the River Derwent partnership and/or the Rye bid (E12) • Latest CPRE Research on Dark Skies (E20) 	<p>Agreed.</p>	<p>References will be added</p>
<p>There is a sense that some priority habitats received more attention than others - may have been intentional due to their prevalence and importance. It may be worth reviewing section 2.3 and others addressing habitats to ensure that non-designated priority habitats are given the intended emphasis, such as mire and transitional habitats.</p>	<p>Agreed, this is intentional – the Management Plan does focus on woodland and grassland as priority habitats and in terms of connectivity and maximising benefits to wildlife. We do however recognise the importance of other habitats and will further liaise with Natural England on this issue.</p>	<p>No change.</p>
<p>Encourage the continued emphasis on eco-system services as part of revisions and integrate the concept of ‘Natural Capital’ with at least an outline description which would help to strengthen the Plan, providing a greater link between the environment and the economy.</p>	<p>This should be an ambition for the next full review when the methodologies are better advanced, but extensive work on this area at the time of the last review revealed the limitations of quantified approaches over an area the size of a National Park. The one specific area suggested for inclusion (recreation opportunities/health benefits) is already mentioned.</p>	<p>Insert at Section 1.6 on page 12 ...benefit people. <i>"Ecosystems services can also be defined as ‘natural capital’ which is the elements of nature that directly or indirectly produce value to people, including ecosystems, species, freshwater, land, minerals, the air and oceans, as well as natural processes and functions."</i></p>
<p>The areas for development and opportunities highlighted in the Outcome 1C self-assessment might be incorporated into the revised Plan.</p>	<p>As above.</p>	<p>No change.</p>
<p>The Plan could be more ambitious in some areas, such as seeking an increase in birds of prey or being more specific about the potential and benefits of blanket bog restoration.</p>	<p>The populations of many birds of prey species have increased in recent years (e.g. buzzard and red kite amongst others) and there is an aim for the National Park to continue to support a diverse range of priority species.</p> <p>Blanket bog restoration is already picked up in several places within the Plan for example</p>	<p>No change, but we would very much welcome a detailed discussion with Natural England about the locations and practicality of blanket bog restoration.</p>

	Section 2.7 and is covered by Policy E30 and an associated indicator regarding the restoration of these areas.	
Monitoring approaches could be made clearer, or the absence of holistic monitoring may need to be highlighted as a challenge and risk.	Further consideration can be given to how we monitor and review specific areas of the Plan through the new Business Plan, through largescale project work (e.g. linked to This Exploited Land) and through bi-lateral agreements with partners including Natural England. The new Local Plan is also likely to consider how the monitoring framework can be improved, including links to the Management and Business Plans.	No change, but we will consider how the monitoring framework can be simplified and made clearer as part of the Business Plan, and Local Plan monitoring regimes and through the State of the Park Report.
<p>1.8 Pressures to change</p> <p>The Water Framework Directive could be emphasised as an umbrella approach to addressing issues on relevant N2K sites.</p>	More detail on the proposal to use the Water Framework Directive as an umbrella approach to addressing issues on European Designated Sites (Natural 2000 Sites) would be needed if this were to be considered. There is also uncertainty on the future of the Framework following the EU Referendum	No change
<p>1.9 How the Management Plan will be Delivered</p> <p>An evaluation of progress made on targets since the plan was originally drafted could be informative</p> <p>What underpins the aspiration for 6,000 additional sheep? Evaluate whether this has changed.</p> <p>Several aspirations focus on increasing particular habitat types. However, in section 2.3 the case is made that it is the connectivity between important existing habitats is key to their resilience. Should there be target to improve</p>	<p>Review of progress against the Plan has been undertaken throughout its first five years, subject to resources and the ongoing budget reductions, through various topic specific reports to Members, through the annual scrutiny meetings and topic specific discussions with Members and external partners.</p> <p>Evaluating change against the aspiration of additional sheep in the park is required but there is currently no reason to assume that assumptions have changed.</p> <p>There are clear targets for improving habitat connectivity in the Authority's Business Plan and there will be a continuation of these into the new Plan.</p>	<p>No change, but we will carry out a review of indicators in time for December committee.</p> <p>No change</p> <p>No change, will be covered in the business plan.</p>

<p>connectivity and a mechanism for evaluating this?</p> <p>Also in section 2.3 should there be an aspiration for an increase in raptors or measures to decrease persecution incidents?</p>	<p>The Plan covers illegal persecution of protected species (which is not confined to birds) and commits the Authority to continue supporting the enforcement agencies in action against these crimes. Officers are not therefore proposing changes to the Management Plan text on this but do believe that more specific (and vigorous) action in some areas is needed and that this should be identified in the Business Plan.</p>	<p>No change, will be covered in the business plan.</p>
<p>2.1 Landscape E1; Have the Landscape Conservation and the Joint Action Plans been put together with NE? If so, we need to review these as a part of this refresh. If not, need to review the relevance of such plans and set out a timetable to compose.</p>	<p>Further work is needed on Landscape Character Assessment to inform the development of the new Local Plan and working with Natural England on this will be essential.</p>	<p>No change. We will look to renew a mutually agreed joint action plan with Natural England.</p>
<p>2.2 Historic Environment Update figures specifying condition classifications of scheduled monuments and listed buildings</p>	<p>The figures will be updated to reflect the significant positive progress that has been made with At Risk monuments through the Monument Management Scheme (MMS).</p> <p>Further work is needed to set out targets for At Risk heritage moving forward and this work will be done as part of the new Business Plan reflecting important projects such as the MMS and TEL</p>	<p>Figures will be amended.</p> <p>To be taken forward as part of the Business Plan</p>
<p>2.3 Habitats and Wildlife SPAs are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive. SACs are strictly protected sites designated under Article 3 of the EC Habitats Directive but this it is not clear in the text (pg. 32).</p> <p>Mire habitats not mentioned as part of the designated features but are very important in a national and international context. Small mention of the Dalby sites (where the whorl snail is referenced) but this perhaps misconstrues these</p>	<p>We will clarify reference to the EU Nature Directives.</p> <p>See comment on priority habitats at the start of this response to Natural England's comments. We do recognise the importance of other habitats and will further liaise with</p>	<p>Section 2.3 page 32 first paragraphunder the Habitats <i>and Birds</i> Directives</p> <p>No change.</p>

<p>areas as isolated relicts rather than as an integral part of complex habitat mosaics.</p> <p>Degraded deep peat may warrant some discussion.</p> <p>The River Esk discussion omits mention of sea trout. The River Esk is largely a sea trout river that supports salmon too. Both species are contributed to an important life stage of the Pearl Mussel.</p> <p>Need to understand more about important habitat connections, their evaluation and what a successful habitat connection may entail in this context.</p> <p>'No decline in Merlin population' may not be realistic if climate change is a factor and other causations are not better understood. Should there be an ambition to better evaluate the current causes of decline and/or to ensure that appropriate habitat is in place to ensure the maximum potential for Merlin populations can be realised whilst allowing natural changes to occur.</p> <p>E10; Marine Plan - it may be important to review or refresh this plan. May need to consider the current status of LBAP and the importance of external funding sources.</p> <p>E13; the Joint Action Plan should be reviewed or refreshed where appropriate.</p>	<p>Natural England on this issue</p> <p>See comment above regarding blanket bog.</p> <p>Section 2.10 paragraph 5 of the Plan mentions the Esk as a sea trout and salmon river.</p> <p>As mentioned above the Business Plan covers more detail about the delivery and evaluation of habitat connectivity and more work on this will be done through the new Business Plan.</p> <p>More work is needed to understand the situation with the worrying decline in Merlin, although there is a strong suggestion that Climate Change is a key factor. Please also see our response to similar comments made by the RSPB above.</p> <p>The development of the Marine Plan for the North Eastern area which covers two marine plan areas is ongoing and is being led by the Marine Management Organisation. We recognise Natural England's role in this. Beyond this strategic planning document it is felt that the marine and coastal environment should be put forward as a priority for our new Business Plan through our work to generate external funding.</p> <p>With regards Policy E13 we recognise Natural England are an important and valued partner in delivering WFD improvements and work is necessary to review the joint action plan.</p>	<p>No change</p> <p>No change</p> <p>To be covered in the Business Plan.</p> <p>No change at present, further work is needed to understand the issue. This will be taken forward as part of the business planning process.</p> <p>No change. To be covered in the Business Plan.</p> <p>Noted, no change.</p>
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<p>2.4 Tranquillity</p> <p>Any thoughts about re-wilding and where this could add value?</p>	<p>We welcome the positive comments on the Plan's coverage of tranquillity.</p> <p>Much of the work going on in the National Park through the work of partners, agri-environment and the Authority contributes to the principles behind rewilding and the Plan's ambitious targets for woodland creation are one key example of what we're working towards in this area.</p> <p>We also need clearer definitions of the concept before we can consider how it will be taken forward and that we'd welcome any input Natural England may have on this.</p>	<p>Noted.</p> <p>No change</p>
<p>2.5 Geodiversity</p> <p>It would be good to separately review what this might entail and so that we might enlist the assistance of appropriate advisers to assist as appropriate.</p>	<p>Proactive work on Geopark status has been deprioritised as a result of the previous reductions to resources the Authority has experienced. Should this be prioritised again partnership input from Natural England would be welcomed.</p>	<p>Noted, no change</p>
<p>2.7 Soils</p> <p>Bare soil and resultant siltation can be exacerbated by dieback of Himalayan balsam. Another risk to soils is poor forestry practice, particularly relevant in the ambition to remove pine plantations as indicated elsewhere in the document.</p>	<p>We agree Himalayan Balsam is an issue in the National Park and this is recognised in a number of places however we don't directly mention its role in sediment loading to rivers. Neither do we mention that badly managed forestry work can also create sedimentation issues. We will review the challenges in Section 2.7 for potential mention of these</p>	<p>References will be added</p>
<p>2.8 Moorland</p> <p>In recent times, control of <i>Strongyle</i> worms and reducing the occurrence of <i>Strongylosis</i> has enabled higher red grouse densities and reduced, to an extent, their cyclical population dynamics. This has enabled a more intensive system to operate which have further impacts on moorland management practices, infrastructure demands, etc.</p>	<p>We understand the reference to <i>Strongylosis</i> we feel it is an unnecessary level of detail for the Plan as a strategic document. Intensification is regulated by Natural England with regard to burning, most development is regulated by the Park Authority.</p>	<p>Noted</p>

<p>Bracken is of value to Whinchat, both distinctive characteristics of the moors.</p> <p>Specifically reference natural flood risk management as a term?</p>	<p>We recognise that Bracken does have some environmental value for Whinchat and for other species (e.g. chickweed wintergreen) but bracken areas need to be managed and although the Plan commits to controlling and reducing bracken it will not eradicate it from the landscape.</p> <p>Although the principles that underpin Natural Flood Risk Management (NFRM) as a concept are well covered in several parts of the Plan mention of the specific term is omitted. We will include this as appropriate and also consider how the nationally and locally regarded project Slowing the Flow can be included.</p>	<p>Noted</p> <p>Reference will be added</p>
<p>2.9 Trees and Woodland</p> <p>Nightjars may be preferentially present in the first 7-10 years after woodland planting as the deep heather is gradually overtopped with trees.</p> <p>Old tree resource could be part of a ‘tourist trail’ – especially if linked to other trees in the Ancient Tree Hunt (ATH) run by the Woodland Trust.</p> <p>Threat from new diseases requires more discussion, and the issues arising from clear fell of larch, including replanting with other conifer species and sedimentation. Provide a general approach to take, or a plan to be developed which would manage these issues amongst key partners across the Park.</p>	<p>Please see above regarding nightjar.</p> <p>The tree trail idea is an interesting one but is more operational than is appropriate for the Plan.</p> <p>We agree that further discussion is needed regarding new diseases, including tree disease and pest that will likely increase as a result of climate change. This will be covered in greater detail through the new Business Plan.</p>	<p>No change</p> <p>No change</p> <p>Noted, to be taken forward through the Business Plan</p>
<p>2.10 Rivers and Streams</p> <p>Water body condition figures may need to be updated.</p> <p>Rewording of the 3rd bullet in Challenges about reducing the diffuse pollution may help in understanding the meaning. 4th bullet point to state water levels <i>and flows</i>.</p>	<p>We agree water body condition figures will be updated.</p> <p>Noted.</p>	<p>Figures will be updated.</p> <p>Section 2.10 fourth bullet: ...affect water levels <i>and flows</i>, quality and wildlife.</p>

<p>Updated information about the occurrence of flooding and specific Natural Flood Risk Management approaches.</p> <p>The indicator / target table could more specifically reference prioritised water bodies and measures in RBMP2, particularly for the Esk and coastal streams or add this to the footnote.</p> <p>A healthy environment that is resilient will better manage and respond to the impacts of climate change, i.e. to infiltrate and attenuate increased rainfall and runoff. This section provides an opportunity to elaborate on these connections.</p> <p>Reference to Priority river habitats –worth highlighting that Priority habitat for rivers has recently been extended and the NYMNP headwaters are a significant resource. A target or measure of progress from the BAP included in the Plan may add value.</p> <p>Could it be relevant to include reference to SIP action plans as a measure of progress in the table on page 37/58?</p>	<p>The information on flooding appears up to date but we will investigate further.</p> <p>More detailed information is presented in monitoring documents</p> <p>The links between a healthy environment and climate change adaptation capacity is something that would require more detailed consideration and rewriting and is suggested as something for the next new Management Plan in the same way as for natural capital concepts. There is however already broad recognition of these concepts in Plan.</p> <p>References to the revised Priority Habitat Status and the Natural England Site Improvement Plan for the area can be added to any new annex document to the Plan linked to this review.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>References will be added.</p> <p>This will be considered as part of work on reviewing monitoring frameworks.</p>
<p>4.3 Forestry and Woodland Timber traffic/ size of vehicles need to be tailored to an appropriate and sustainable size for other environmental and built features, and at scale to create less damage to buildings and road infrastructure.</p>	<p>Noted. The broad issue regarding impacts of extraction is covered in the Plan. We agree that the plan should cover the issue of the careful planning of new tracks</p>	<p>Add to the end of the second bullet on page 88 ...network <i>and requirements for new tracks</i>.</p>
<p>4.4 Moorland Shooting Would be useful to have an estimated ‘income’ for the area as with the farming section.</p> <p>No mention of avoiding birds of prey persecution or the impacts of predator control, though briefly mentioned elsewhere.</p>	<p>We will look into the evidence that is already available regarding the positive economic value of the shooting industry to the local area, which the Plan recognises.</p> <p>See above regarding wildlife persecution in response to the RSPB comments.</p>	<p>This will be added if information if available.</p> <p>No change, will be taken forward in the business plan.</p>
<p>4.7 Fishing An additional challenge is the need to improve spawning</p>	<p>This issue is picked up in Section 2.10.</p>	<p>No change.</p>

habitat quality for fish for a more sustainable life cycle, which is effected by impacts of diffuse pollution from siltation and poor riparian management.