

## **Appendix 6: Peer Review (summary of partnership responses received from Dec 2016)**

### **General observations**

- LWT & NE both suggest a greater use of case studies to evidence progress since last Plan – examples could include LCSP, links with farming sector (Open Farm Sunday), work of the CFE's etc.

### **Landscape**

- The National Trust supports the Plan and resulting advice/guidance within the Strategy but feels that as they are not in the AONB they have limited ways they can actively get involved in the work of the AONB Partnership.
- Opportunity to link with Gunby Hall via National Trust's Land, Outdoors and Nature Strategy. Gunby implementation planned for 2018.
- The NT highlights that they look forward to a time when the AONB could be extended to include their land holdings.

### **Biodiversity**

- NE – ecosystems approach is essential. Through collaboration we must seek to achieve diverse, abundant and accessible nature & not just focus on the rare and special.
- Concerns from GLNP and LWT on habitat loss through reduction/influence lost through CAP Pillar 1 Cross Compliance e.g. options for riverside habitats, hedgerows and landmark trees.
- Wide concerns on changes post Brexit, climate change, bio-resilience to various pests and diseases – Chalara (Ash Die Back), Acute Oak Decline – emerald beetle etc.
- NE highlight the importance of future delivery tools, such as the replacement for Countryside Stewardship (CS), and the CS Facilitation Fund, being used in an integrated way to enable and advise effective local delivery.
- NE recognises that raising awareness and sharing good/best practice at "grassroots level" is critical – supports the promotion of various case studies.
- ELDC supports original issues as listed, but highlights post Brexit uncertainties, esp on account that much of our wildlife (environmental) legislation has European origins.
- LCC (Planning) do not feel that climate change and the threat from existing & invasive species is still a relevant issue.
- NT recognises all issues and policies still relevant – no additional comments supplied.

### **Meadow, Pasture and Wet Grassland**

- NE & LWT highlight need to recognise post Brexit changes & support for the development & implementation of wider multi-functional approaches.
- NE - Review & modify stewardship scheme info to reflect new terminology and/or Mid & Higher-tier Countryside Stewardship; review any emerging clarity post Brexit.
- LCC (Planning) has some differences of opinion with other partners in respect of grassland management conflicts with future land-use/habitat changes e.g. new woodland planting and miscanthus (energy crops).
- GLNP comment on GP3 Policy - whilst well intentioned who can take the lead on developing initiatives to support grazing of less productive grasslands? Are there any initiatives locally? Various 'matchmaking' services have been undertaken in other areas of the UK.
- Explore opportunities of rare breeds "Lincolnshire russets" and local products including dairy that rely on livestock.
- LWCS question - is there a bigger issue of intensive livestock rearing; with less reliance upon pasture fields and potential increasing trend towards poultry farming?

- NT recognises all issues and policies as still relevant – no additional comments supplied.

### **Grass Verges and Green Lanes**

- Biomass opportunities – link with LCC Study (LWT) any lessons learnt and consider Life on the Verge as a suitable case study.
- LCC (Planning) recommend revising objectives and policies although no suggestions to revised wording supplied; but pose the question "will the decision of the County Council to cut back its cutting of road-side verges have any impact and need to be taken into consideration?"
- NT recognises all issues and policies as still relevant – no additional comments supplied.

### **Chalk Rivers, Streams and Ponds**

- EA recognises the need for greater understanding and further research to help evidence the pond resource across the Wolds.
- Concerns from Forestry Commission regarding loss of riverside trees and subsequent increase in water temperatures.  
(note - Chalk Streams Management Guide recommend seeking a balance of 60% light and 40% shade for the surface of the river/stream channels to maximise channel biodiversity for aquatic flora and fauna, including brown trout).
- LCSP - continuing focus on catchment partnership approaches to help implement river restoration, habitat buffering etc, - working to minimise sedimentation impacts and maximise biodiversity, water quality and flood mitigation gains.
- LCSP - Ongoing awareness of the need and benefits of helping to raise public and landowner awareness of the Lincolnshire chalk stream resource and the opportunities for getting involved.
- Contrary to other responses from the LCSP, LCC (Planning) do not view diffuse pollution and sedimentation as a current issue.
- NT recognises all issues and policies as still relevant – no additional comments supplied.

### **Woodlands, Beech Clumps and Traditional Orchards**

- FC highlights the need for greater flexibility with planting mixes to safeguard from climate change and pests/diseases.
- Mapping of small woodland resource remains an issue but who/how is this to be resourced.
- Differing views on whether inappropriate planting (locations and species) is still an ongoing problem. For example - NE & FC both think this is no longer an issue; LWT & GLNP feel it is.
- LCC (Planning) do not feel that climate change and the future viability of some native issues, including new pests and diseases is still a relevant issue.
- NT recognises all issues and policies as still relevant – no additional comments supplied.

### **Hedgerows and Landmark Trees**

- New issues highlighted include tree health and biosecurity especially from Chalara (Ash Die Back) and Acute Oak Decline.

- Impacts post Brexit especially with cross compliance (via Pillar 1 funding) currently supporting hedgerow/ditch boundary maintenance etc.
- NT recognises all issues and policies as still relevant, in particular stressing the pressures landowners are under to remove roadside trees on H & S grounds.

### **Earth Heritage – Geodiversity and Soils** (see also comments on agriculture)

- LCC (Planning) – the recently adopted Minerals and Waste Local Plan has not identified any need for additional quarries for chalk or the need for any additional landfill capacity so only expect that land with historical permissions or existing sites will be developed in the future.
- The GLNP highlights the issue of the need for ongoing management of geodiversity sites to maintain their interest/condition.
- NE highlights a case for strengthening partner efforts to raise awareness and understanding of soil related issues e.g. through river catchment initiatives, Lincolnshire Chalk Streams Project work, CS Facilitation Fund & other future mechanisms.
- NT recognises all issues and policies as still relevant – no additional comments supplied.

### **Agriculture** (see also comments on soils)

- NFU recognise the key issue of Brexit and its impacts upon the farming sector including;
  - 1) Future subsidy payments – any new schemes need to be advantageous for Wolds farmers with achievable and sensible conditions.
  - 2) General concern stressed on the poor uptake of Countryside Stewardship across Lincolnshire. Farmers have been put-off by much of the Defra/Rural Payment Agencies bureaucracy, including overly excessive inspection regimes and very onerous record keeping obligations.
  - 3) The implications from a shift to world market prices under WTO (World Trade Organisation) rules and the possibility of tariffs.
  - 4) Uncertainties in future legislation/regulations for food production, pesticide application, environment etc; a plea to minimise future red tape and Defra gold plating.
  - 5) Concerns with mobility of the work force in respect of the future use of foreign nationals – some scheme for agricultural workers is required.
- LWT, GLNP and NE all highlight uncertainties and future impacts from changes to domestic agricultural policy in light of Brexit – changes to cropping patterns, global markets etc.
- Roll of future voluntary/paid agri-environment schemes is unclear.
- Increase in interest for energy crops including miscanthus and more recently maize.
- NE highlights need to maximise Natural Capital approaches to help raise awareness with local businesses, schools and wider public.
- Future survey work for helping our understanding of distinctive arable wildlife – GLNP question what is meant by "distinctive"? NE asks how and what parameters? Future links with University of Lincoln?
- EA recommend that landowner engagement should also seek to raise awareness and understanding of increased sedimentation on our river systems and the potential impacts on water quality, ecology and flood risk.
- NT recognises all issues and policies as still relevant – no additional comments supplied.  
(See also comments on Soils)

## **Farming and Field Sports**

- LWT, NE and GLNP recommend refreshing issues in light of forthcoming Brexit scenarios and the uncertainties in the farming sector.
- LCC (Planning) agree with others on the need to support but revise Policy FWP2 (monitoring and influencing changes in regional, national and EU agricultural policy...). Stressed that with the uncertainty following Brexit there is an increased importance to influence agricultural policy to bring benefits to the Wolds.
- NE asks if the EA still have a budget/project to provide advice through workshops for farmers which could help aid delivery of Policy FWP7?
- LCC (Planning) still deemed important, but requested a revision to Policy FWP7 (to raise awareness within farming community of the growing issues of climate change, sustainable energy and carbon management). No further details or suggestions supplied.
- NT recognises all issues and policies as still relevant – no additional comments supplied.

## **Archaeology and Built Heritage**

- NE supports all outstanding issues and highlights the opportunity to use examples from the Down Your Wold project.
- NT recognises all issues and policies as still relevant – no additional comments supplied.
- HL recognises all issues and policies as still relevant – some minor changes to wording of some policies suggested including the merging of Policies BHP1 and BHP4 due to their close similarities.
- In respect of Objective AO (to protect, appropriately manage and enhance archaeological and historic features within the AONB...) HL stresses the importance of the need for further research and a coordinated management approach from all agencies in consultation with landowners. Research is viewed as key, as the potential for archaeology needs to be fully assessed in addition to applying this objective to all known archaeological sites and features.
- HL – Policy AP1 (to encourage and support research projects to help increase understanding of the Wolds etc); further research is required to fully understand the significance of a wide range of heritage and to share this with people living and working in the area. Identifying what and how features are at risk will allow for priorities to be determined so that resources can be targeted. Baseline information is in place and needs to be updated.
- Policy AP3 (to increase and enhance appropriate public access to sites of archaeological interest etc.) HL highlights increased public access as valuable for local residents and could also be promoted to visitors to the area in order to increase the perception of the Wolds as a historic landscape.
- Policy BHP1 (to work with property owners, residents, owner occupiers and developers to encourage sympathetic design and management of buildings); HL stresses that working with planners in relevant authorities on a Design Framework/Guide for Wolds villages would be useful so that they can also offer the right level of advice and guidance at pre-application stage.
- Policy BHP2 (to raise awareness of the built heritage in the Wolds etc.); in terms of future delivery, HL recommends a project that can explore the morphology of Wolds villages – their common characteristics and their unique development attributes, such a project could encourage volunteer input.

- Policy BHP3 (encouraging and supporting sustainable re-use of buildings using local materials...); HL reports that funding for private owners is now incredibly rare but small scale grants can be an effective way to encourage conservation and re-use. Case studies about how redundant buildings have been reused in the past are very helpful to demonstrate how this can be achieved.
- Policy BHP3 (encouraging and supporting sustainable re-use of buildings using local materials...) LCC (Planning) feel that there is no evidence of lack of availability of local building materials that would constrain this approach.
- LCC (Planning) – support but revise Policy BHP4 (encouraging/supporting innovative new construction taking inspiration from local character etc); no further details supplied. HL also suggest a slight re-wording of this policy.

### **Thriving Communities**

- ELDC, NE, LWT, GLNP - ongoing issues still valid to varying degrees but esp. concerns with local services/ facilities (inc. access to public open space) and future local employment opportunities.
- LCC (Planning) do not perceive an issue with limited public open space.
- LCC (Economic Regeneration) – the Thriving Communities section of the Plan looks to be too wide ranging. Consider splitting down into "Living in the Wolds", "Working in Wolds" and "Visiting the Wolds" or similar.
- Policy TCP2 (reversing the decline in rural services and promoting healthier lifestyles) – NE stresses that Defra wants to make clearer the links between a healthy natural environment and public health and prosperity. LCC (Planning) highlight the continued concern raised about the lifestyles of all ages and impact on health so important that contribution to the promotion of healthy lifestyles is recognised.
- Policy TCP2 - ELDC reports that the decline in rural services has not slowed down and that many of the smaller communities now have little in the way of services, with poor transport, isolation and deprivation more likely to occur.
- Policy TCP4 (community links with green infrastructure) - ELDC notes that this is arguably likely to become even more important as the appetite for more tourism and recreation increases via Love Lincolnshire Wolds initiative. LCC (Planning) reiterates the links to health benefits as detailed in response to TCP2.
- NT recognises all issues and policies as still relevant – no additional comments supplied.
- LAZ (LEADER) deemed all issues and policies as remaining important with the following additional comments:-
  1. Suggested new issue with the ongoing EU review of the Common Agriculture Policy (CAP) and the potential development of a new "British Agricultural Policy". There could be a role for the AONB Partnership to influence whether the future Rural Development Programme will include LEADER funding (or similar) i.e. rural development (socio-economic) funding to support economic growth and "quality of life" in rural areas.
  2. The LAZ flagged up that in terms of the overall Objective TCO (Support and promote partnership activity to safeguard/enhance the prosperity and well-being of communities within the Wolds etc...) the vulnerabilities for the communities still include outward migration of young people creating challenges for businesses in all sectors including the ability to attract and retain suitably qualified employees. (High growth is projected in the 65+ age group with the working age population set to reduce by 5% between 2017 and 2037 (Ref: LAZ LDS 2014).

3. LAZ highlighted that in respect of Policy TCP2 (reversing the decline in rural services and promoting healthier lifestyles) issues still exist over broadband access and connectivity. Furthermore the average distance to key services is generally more than countywide or national average distances.
- LCC (Economic Regeneration) did not wish to comment on individual issues, objectives and policies as listed in the current M. Plan but wished to provide some wider observations and pose a number of questions for the Partnership. An overriding comment in respect of rural economies is the way that they are operating is changing, they are much more than simply economies providing employment and tourism - increasingly they are offering a wide range of additional services to the local community – e.g. schools, convenience stores, childcare to help families work and care services to the most vulnerable. There is also a shift in the affordability/viability of businesses so that there is an ever increasing need for communities to grow in order to help maintain their services (e.g. local pubs, shop, bakers, butchers, hair dressers etc, many of which can no longer survive in today's world/economy). Thinking about future pressures the following points were highlighted:
    1. The Plan might want to explore whether the AONB positively leads the way of life of its residents, or whether its residents' way of life has to adapt to be suitable to the AONB. Arguably, the AONB should be part of the psyche of its residents and lead their way of life.
    2. There is a debate to be had over the increase in population size versus tranquillity (sense of place) arguments. LCC (Economic Regen) ask if the Local Plans have the balance right in terms of enabling the sustainable growth of village settlements.
    3. In the light of news for 100% rural rate relief for businesses the AONB Partnership should consider specific actions that can help nurture and support small businesses in our deeply rural communities e.g. seeking to diversify the income streams of rural businesses but doing so in the context of the AONB's character.
    4. The Partnership should consider also nurturing and supporting links with further education colleges and academics to help aid research, (informing our evidence base, knowledge and understanding) and provide lasting legacies; as well as an opportunity to explore new income streams.
    5. There is an issue in respect of utilities (power, heat, water, digital), both costs and supply. Could and should more be made of the natural assets in the AONB to help ensure future supply and minimise the costs e.g. water power generation etc.
    6. The Plan needs to maintain and develop a greater focus on the inter-relationship between the market towns and the rest of the AONB. What can the AONB's communities do to stop them being simply a drive-through to the larger towns, in turn taking pressure off the market towns themselves. There will still be particular services that the AONB communities would need the market towns to provide (e.g. vocational training, + *additional NHS services, larger retail units etc*).

### **Interpretation – Awareness Raising**

- NE recognises that the broad interpretive-awareness raising Objective (IO) accords with NE's Conservation Strategy principles of "putting people at the heart of the environment" and "Natural Capital".
- LCC (Planning) stresses that in terms of overriding objective (IO) and Policy IP2" (strengthening the profile of the AONB); "with the success of Lincoln as a tourist attraction in recent times extra effort should be made to encourage these visitors to go beyond Lincoln". Consider revising Policy IP2 accordingly.

- WLDC (economic team) highlights the importance of the overarching objective IO (raising the profile of the AONB...) and the links with the emerging Love Lincolnshire Wolds (Wolds & Market Town Groups) and its Destination Management Plan. The Destination strategy includes specific actions aimed at increasing visitors, identifying gaps in provision and working with partners, all of which in turn will enhance resident facilities & bring economic benefits.
- WLDC notes the links to businesses that are engaged with the Wolds & Market Town Groups and connections with the Love Lincolnshire Wolds branding/website.
- ELDC, HL, LCC (Planning), NT and LAZ (LEADER) recognise all listed issues as still relevant.
- HL identifies an additional issue of promoting the importance of the value of established festivals and events, helping to demonstrate the vitality and cultural interest of the Wolds area.
- Objective IO (raising the profile of the AONB...); HL suggests re-wording to highlight the economic benefits. Also Policy IP2 wording is very similar to the overarching objective so is IP2 needed?
- Policy IP1 (to provide visitors and residents with a greater understanding and appreciation of what makes the Lincolnshire Wolds a special place...); HL highlights that there are several 'gateways' into the Wolds and a coordinated approach offering good quality information about all of the special attributes of the area is needed. A creative interpretation scheme would be very effective at creating an enhanced sense of place and improving visitor experience.
- Policy IP3 (to encourage residents to become actively involved in the interpretation and promotion of the area...); HL comments that local residents know the area best and have a wealth of knowledge about its character, history, best views, places to eat etc. Using promotional material which uses local voices to invite people to visit and to learn more about the place would provide a strong marketing/interpretative approach.

### **Access, Recreation and Tourism**

- LCC (Planning) suggests revising of Policy ARTP3 (developing joint promotion and marketing initiatives to raise the profile of the Lincolnshire Wolds AONB etc) to link with Lincoln tourism opportunities – see comments for Policy IP2 above.
- LCC (Planning) revise Policy ARTP4 (identify gaps in current access, recreation and tourism provision etc) but no further comment supplied.
- Policy ARTP1 (to maximise opp's for all visitors and residents of the AONB, improving provision for quiet recreation); HL suggests a definition/clarification of the term 'quiet recreation'.

## Planning and Development Management

- WLDC (planning team) recognises the value of the AONB Partnership in reviewing planning and development management issues/themes but questions the use of presenting as "policies" as these will not have that status and there is no sense in duplicating what is already expressed in the Local Plans (inc Central Lincolnshire Local Plan) – so for e.g. the M. Plan cannot seek to deliver (more or less) affordable housing that will already be specified in local plans. Such policies should come out and be re-worded along the lines of "development should be supported that will.... protect and enhance the character of the area; development of affordable housing to support the ongoing sustainability should be promoted where it is appropriate in scale & design.
- LCC (Planning) recognise and support all previous planning issues and in addition highlighted a new issue of hydro-carbon exploration – planning permission has been granted for hydro-carbon exploration (*site in Biscathorpe*)- if drilled and successful this may result in pressure for further sites in the AONB.
- LCC (Economic Regeneration) Planning in rural areas needs to embrace businesses when they want to expand, however the time taken with the planning and decision making process may often put people off. Is there a role for the M. Plan in setting out some guidance for developers and planners when it comes to development in the AONB?
- Policy PP1 & PP2 (protecting and enhancing local character and distinctiveness through the highest quality in design; including for traditional buildings) - LWT & NE request stressing the importance of making space for biodiversity & tackling climate change in design.
- Policy PP3 (supporting development of local needs/affordable housing – ELDC stresses that current reductions in funding to Registered Social Landlords mean that their opportunity to provide affordable housing is seriously curtailed. Currently no formal housing allocations within East Lindsey portion of the AONB following objections to the Local Plan proposals; thus likelihood of limited affordable housing being provided via quota system on new market sites.
- Policy PP4 (minimising damage to the AONB landscape as a result of mineral working...) - LCC (Planning), as above comment, pressure for additional hydro-carbon extraction may be forthcoming.
- Policy PP6 (dark night skies)- ELDC notes the potential for this to become a more important issue if the amount of tourism in the area increases.
- Policy PP7 (wind energy schemes) - ELDC reports a drop in demand in wind farm applications largely on account of changes to subsidies; this could change if there are further modifications to the current national approach (incentive mechanisms).
- Policy PP8 (general waste reduction and recycling initiatives) – LCC (Planning) suggest policy revision highlighting that as we move towards a circular economy and a desire to 'make things last longer' this policy is an even more important requirement and should be given a high priority.
- NT recognises all issues and policies as still relevant – no additional comments supplied.
- The LAZ (LEADER) highlights the ongoing relevance of the Lindsey Action Zone Local Development Strategy 2014-2020.
- The LAZ also stresses the continuing importance of the England Rural Development Programme (RDP) initiatives and regulations. For the Lincs Wolds, as well as Countryside Stewardship, it also specifically includes the Lindsey Action Zone LEADER fund which makes funding available to business and community projects, up to c£40,000 at 40%. The funding is for projects that contribute to the rural economy and create jobs (for commercial businesses). The six national priority areas are farming, forestry, small business start-up and development, tourism, heritage and rural services. AONBs and National Parks are uniquely placed to engage in future planning for the ongoing Rural Development Funding – to aid and support local delivery and help ensure these priority areas continue to be relevant.



- HL highlights the ongoing issue of renovation/development of redundant farm buildings. Queries why there appears to be no clear policy for farm buildings in this section (LWCS note – possible duplication with Policy BHP1, BHP3 and BHP4).
- HL considers Policy PP1 (to promote and enhance local character and distinctiveness through the highest quality design...) to be a repeat of an earlier policy within Built Heritage section.
- HL considers Policy PP2 (to encourage and support the sensitive conversion of traditional buildings to new viable uses...) to also be a repeat of an earlier policy within Built Heritage section.
- CPRE has offered to assist the AONB Partnership in developing a document for a model "Wolds Landscape Character Proposal" that could help aid and inform future Neighbourhood Plans and Plan Policies – this would build on national CPRE work in this area to provide local context.

### **Transport in the Wolds**

- ELDC recognises all current issues as valid and in terms of overall objective highlights the potential for transport related issues to become more important if there is a significant increase in the tourism offer in the Wolds. There may be a requirement to create better access links and certainly a likely increase in demand for signage associated with attractions and facilities.
- LCC (Planning) recognises all issues as still valid, and though still important recommends revisions to Policy TWP3 (encouraging transport infrastructure improvements to support appropriate tourism etc), Policy TWP5 (encouraging integrated and well maintained public right of way - network etc), and Policy TWP6 (maximising access for all on the PROW) to take account of earlier commentary on Policy IP2 e.g. securing the wider links to visitors from Lincoln + helping to promote healthy lifestyles.
- NT recognises all issues and policies as still relevant – no additional comments supplied.

### **Climate Change**

- NE recognises all existing issues as still relevant + highlight the impact of future cropping patterns.
- LWT & GLNP stressed the issue of anaerobic digesters and increasing demands for energy crops such as miscanthus and more recently maize.
- FC highlighted a new issue of increasing pressure on woodlands to supply woodfuel to help meet Renewable Heat Incentive requirements.
- ELDC recognises all existing climate change issues.
- LCC (Planning) recognises all issues as still relevant except for the emergence of new pests, diseases and invasive species.
- NT recognises all issues and policies as still relevant – no additional comments supplied.

### **Monitoring**

- NE – objective of "condition" monitoring demands robust (and regular) reviews of baseline/evidence.

**Key to organisations/groups who formally responded during the initial peer review:**

EA	Environment Agency	ELDC	East Lindsey District Council
FC	Forestry Commission	GLNP	Greater Lincolnshire Nature Partnership
HL	Heritage Lincolnshire	LAZ	Lindsey Action Zone
LCC	Lincolnshire County Council	LCSP	Lincolnshire Chalk Streams Project
LWT	Lincolnshire Wildlife Trust	NE	Natural England
NFU	National Farmers Union	NT	The National Trust
WLDC	West Lindsey District Council.		