

# Comments received on the consultation draft of ' A Landscape Strategy for the Malvern Hills Area of Outstanding Natural Beauty (AONB)'

General comment: Comment referring to the Landscape Strategy as a whole

Specific comment: Comment that is specific to a particular Landscape Character Type

Sustainability Appraisal comment: Comment referring to the Sustainability Appraisal that accompanied the Landscape Strategy and Guidelines

Comment type	Comment	Response
General comment	I found your draft strategy easy to read and comprehensive in its coverage. The inclusion of fauna and flora key indicator species is a useful guide to what specifically should be protected.	Comment noted. Key indicator species have been removed from the document because it was not possible to identify them consistently across the area with the data available.
Specific comment	The Malvern Hills AONB Landscape Character Areas differ slightly from those chosen by Herefordshire County Council Areas. In Colwall there are only three areas designated, namely: High Hills and Slopes, Principal Wooded Hills and Principal Timbered Farmlands. On your map there seems to be a small area in the far south west of Colwall Parish designated Wooded Hills and Farmland. This does not seem to be covered in the descriptions accompanying your draft.	The area is covered by the Wooded Hills and Farmland draft text
Sustainability Appraisal comment	The matrix approach is interesting and would appear to ensure that sustainable development will have a positive effect overall.  It could be argued that in the long term, health and community would benefit from this development i.e. have 'Some positive effect', rather than 'Neutral effect.'	Comment noted
General comment	Two comments on the Sandstone Estatelands comments:  1. Communities must be allowed to continue to evolve. There must be development, albeit in keeping with the landscape and traditional values. The narrative seems to discourage development. A balanced community of houses and working areas is essential.	The current text does not preclude new development, it merely states that it should enhance the character of the landscape and adds that it should also contribute to sustainable future development.

	<p>2. The Bromesberrow Estate has invested heavily in property, hedgerows , woodland and biodiversity in the last 20 years. This is ongoing but reduced funding from Environment schemes and the present economic climate will mean that it is likely that there will be less investment in forthcoming years.</p>	<p>The text has been amended to acknowledge the positive management, which has been undertaken in large parts of the Landscape Character Type. The document recognises the need to support such work in the long term.</p>
<p>General comment</p>	<p>The strategy seems rather vague and uninformed. For instance:</p> <p>Increasing visitor numbers has contributed to the erosion of grassland. There is an opportunity to develop an access strategy to improve the legibility of signage on the summits. This will help to manage and direct visitors to appropriate footpaths, limiting the damage to the grassland. This should be coupled with appropriate footpath management and maintenance.</p> <p>1 No-one wants signs on the Hills, as this is an intrusion into their intrinsic nature</p> <p>2 Which visitors actually cause the damage? The Mountain Bikers (and this is based on regular walks over 25 years). If you would like me to show you the ruts and erosion damage as I have shown Ian Rowat (Conservators) I would be pleased to oblige.</p> <p>3 Increased livestock - what kind? The summit is unsuitable for cows, being too steep for their legs, and due to the damage they cause to the paths and verges because of their size.</p>	<p>Text has been altered to emphasise that any signage should be very discreet and that that current signs should be restored where possible.</p> <p>Field survey noted desire lines on the hills, which is what this comment is intended to address. Recommendations in the text could also be used to control mountain bike access.</p> <p>Detailed prescriptions of grazing regimes are beyond the scope of the landscape strategy and are addressed elsewhere, e.g. the SSSI management plan.</p>
<p>Specific comment</p>	<p>With governmental drive towards economic growth, Parish Councils will have very little control over planning and so the very notion of a conservation area will be ridden roughshod over.</p>	<p>Comment noted. The landscape strategy provides information that can help Parish Councils and others to help inform change plan and to celebrate the distinctive characteristics of their local landscape. The Malvern Hills AONB unit encourages the production of Parish Landscape Statements and Village Design Statements.</p>
<p>General comment</p>	<p>Although only a small part of the AONB falls into the Redmarley area it was interesting to read the Landscape Strategy for the whole of the AONB. It is</p>	<p>Comment noted. A Building Design Guide is currently being prepared for the Malvern Hills AONB</p>

	<p>very important to retain and conserve the existing characteristics of both land and buildings. Hedges seem a very important part of this and it is to be hoped that they will be renovated and replanted. There should be a very firm grip on Planning to ensure that homes and buildings are built or renovated in the style of the area and that any application for intrusive development is refused. The Draft is very aspirational but if all the suggestions in it can be implemented the AONB would be preserved in excellent health for the future.</p>	
Specific comments	<p>Comments refer to the Sandstone Estatelands page 53 to 58 and Settled Farmland with Pastoral Land Use pages 41 to 47.</p> <p>The landscape should be preserved. Hedges, trees and orchards should be renovated and replanted and the increase in size of fields should be discouraged to preserve the historic pattern. Urban style ribbon development in settlements should be avoided at all costs. Flora and fauna should be protected where possible.</p>	<p>Sandstone Estatelands chapter contains guidelines for hedgerows, settlement pattern and flora and fauna. Only a small area of the Forest of Dean's Low Hills and Orchards LCT occurs within this LCT and field survey info doesn't note the presence of orchards.</p> <p>Settled Farmlands with Pastoral Land Use: All of these subjects are covered by the guidelines.</p>
Sustainability appraisal comment	<p>If all the suggestions in the Landscape Strategy were carried out then sustainability would be achieved.</p>	<p>Comment noted.</p>
General comment	<p>The footpaths on the hills have deteriorated more since Ian Rowat has been in charge than they did in the previous 100 years for the following reasons.</p> <ol style="list-style-type: none"> <li>1)There has been very little spent on them and little of use has been done.</li> <li>2)Motor traffic by the Conservators has increased dramatically with little regard to path wear.</li> <li>3)Bicycle use.</li> </ol> <p>20years ago most paths were grass covered and rain helped them to recover.</p> <p>Now the majority aren't, some being bare rock, which become rivers when it rains. Large drainage grooves are needed across the paths to drain the water off and prevent the surface being swept away. Victorian grooves exist in green valley, what has been attempted recently is farcical in comparison. Just adding more surface, to be swept away, is a waste of money.</p>	<p>Comments noted. The Landscape strategy guideline to develop an access strategy will help to address some erosion issues but it is recognised that other work may also be needed to help solve a difficult problem.</p>

<p>General comment</p>	<p>The AONB Landscape Character Types (LCT) in the landscape strategy are broadly consistent with Gloucestershire’s Landscape Character Types. The AONB LCTs appear to “fine tune” the LCT’s at a scale relevant to the Malvern Hills AONB. Appendix A outlines the review process and refers to the large contribution of the Herefordshire and Worcestershire; however the strategy does not mention the Gloucestershire’s Landscape Character Areas.</p> <p>It is worth noting that Natural England is working towards integrating its nature conservation and landscape character objectives; this work is directly relevant to this strategy.</p> <p>Natural England is currently updating their National Character Areas (NCA) profiles and developing objectives for their future management. This is part of a project seeking to develop more concise and evidence based profiles. It will also include new evidence on ecosystem services to define objectives for landscape quality and ecosystem services (called Integrated Objectives) which can then feed into the Character and Quality of England’s Landscapes (CQuEL). CQuEL is Natural England’s principal integrated monitoring project that will provide place-based evidence on landscapes and the provision and quality of ecosystem services.</p> <p>Nationally and locally the framework for delivery of action on biodiversity has evolved to an ecosystem approach to delivery. Implementation will be achieved through landscape-scale conservation programmes for habitats and species, a different approach to the current habitats and species action plans.</p> <p>The publication of the Governments Natural Environment White Paper in June may clarify the approach as will the new England Biodiversity Strategy also due to be published in June.</p>	<p>Reference to Gloucestershire’s Landscape Character Areas is in the Appendix 3.</p> <p>The landscape strategy has been linked to the draft National Character Area objectives being developed by Natural England. It also takes account of an ecosystems approach to managing the landscape.</p> <p>Comment noted. Landscape strategy has been prepared in accordance with an ecosystems approach.</p> <p>Comment noted.</p>
<p>Specific comment</p>	<p>My only comment relating to the specific chapters on landscape character types concerns an apparent</p>	<p>Key indicator species have been removed from the document because it was not</p>

	<p>lack of consistency in the guidelines in relation to species. Each chapter covering a LCT identifies indicator species; some LCT chapters refer to these species in the guidelines for action “protect, manage and plan” others do not.</p> <p>Not all key species relevant to LCTs appear to have been listed in the relevant LCT chapters.</p> <p>For example; in the sections covering veteran trees, fungi and invertebrates are mentioned as important, however other key species are not, e.g. bats. Bats are also relevant to the sections on the restoration of old buildings and the building of new ones. Ponds are a key habitat identified in the AONB management plan (and the associated species - great crested newt) yet this is not referred to in the relevant guidelines.</p> <p>I appreciate these are broad strategic landscape guidelines and not a biodiversity strategy, however these matters can be vital to supporting management, protection and planning. I feel it would be relevant to refer to constraints and opportunities for key habitats and species in relation to the principles for action of protect, manage and plan. A broad overview of habitats and species relevant to the AONB would be consistent with a landscape scale approach.</p>	<p>possible to identify them consistently across the area with the data available.</p> <p>Landscape Strategy is principally focussed at a habitat level. Detailed advice on biodiversity and specie conservation appears in the local Biodiversity Action Plans.</p> <p>Comment noted. The Landscape Strategy provides a broad overview of habitats associated with each Landscape Character Type. Detailed advice on biodiversity and specie conservation appears in the local Biodiversity Action Plans. As more information becomes available across the AONB consideration will be given to incorporating more species information.</p>
<p>Specific comments</p>	<p>Specific geodiversity comments supplied for most Landscape Character Types</p>	<p>Some additional geodiversity detail has been inserted, where possible into each of the Landscape Character Types where comments were made.</p>
<p>General comments</p>	<p>1. Overall, the document does well to encapsulate the general landscape character of the AONB. Individual types are well described. However, if one reads the whole document in one go, there is an awful lot of repetition, which suggests there may be too many categories. Are we clear about the utility of having so many divisions applied to a relatively homogeneous area, distinct as an entity in itself? In particular, the differences between some of the woodland and farmland types are slight, and others (E and G) cover very small areas (see specific comment about G below).</p>	<p>1. The landscape character framework builds on that developed by local authorities in Gloucestershire, Herefordshire and Worcestershire. Failure to reflect the existing, recognised Landscape Character Types could be confusing. Although some types share similar characteristics, we believe there is sufficient variation to warrant retaining this number of types.</p>

	<p>2. Several guidelines/themes occur repeatedly. If all the Character types are retained, could there be some drawing together of these common themes, e.g. management of hedgerows, preservation of ancient trees, conserving pasture etc? Or is this done somewhere else in the AONB management plan?</p> <p>3. It is not clear (to me) why some themes, e.g. encouragement to use solar panels, enhancing the biodiversity of agricultural land ,occur in one or two categories, but not in others. Again, perhaps an overview would help to clarify.</p> <p>4. Consideration of geological aspects seems very limited, given that rocks are one of the key determinants of 'landscape'. For instance, throughout the document under 'Landscape Guidelines' , there is only one instance given of geological heritage. The term 'Geodiversity' is not mentioned at all (even though it forms a separate section in the AONB management plan) whereas its companion 'Biodiversity' occurs comprehensively. There are also some specific geological omissions (see below).</p>	<p>2. Many of the guidelines meet multiple objectives, which is why a list of relevant themes are indicated alongside each guideline</p> <p>3. The guidelines that are most important for each LCT have been included. A note has been added in the introduction to make it clear that the omission of a feature or element from a LCT does not preclude its consideration if local circumstances require it.</p> <p>4. Additional geodiversity information has been added to most LCTs.</p>
<p>Specific comments</p>	<p>A. High Hills and slopes</p> <p>There is a surprising omission here. One of the most visual landscape features of this Character type are the abandoned quarries. Not only can many of them be seen from afar, but they also have create a distinctive aesthetic local character, not to mention their significance for geoconservation, biodiversity, cultural heritage, and tourism. I would urge that the quarries are an integral part of the landscape, and suggest that this omission from the current document be addressed.</p> <p>On a more minor point, in bullet point 4 of 'Key Characteristics', I believe most of the springs occur at the boundary between the Precambrian Malvern rocks ('solid diorite and granite'), and the sedimentary rocks, rather than the 'more friable volcanic rocks' as stated.</p> <p>B. Principal Wooded Hills</p> <p>It is gratifying that this is the one category that adequately acknowledges the significance of the</p>	<p>Text amended to reflect presence of abandoned quarries</p> <p>Text amended to more accurately describe the location of the springs.</p> <p>Text amended to include mention of the escarpments shaped by Silurian geology.</p>

	<p>geology. In the first paragraph, it may be useful to use the term ‘Silurian escarpments’, as from most viewpoints, that is what you see. Also, I suggest you should add ‘ and the encouragement of the understanding of geoconservation’ to the statements (p.12 and 13) about enhancing biodiversity.</p> <p>C. Wooded Hills and Farmland Several identical features to the previous category.</p> <p>D. Principal Timbered Farmlands Does not the promotion of renewable energy apply to (nearly) all categories?</p> <p>G. Settled Farmlands on River Terraces Some technical inaccuracy here. Geomorphologically, this area is certainly not a river terrace, as for instance characteristic of those of the Severn and other nearby rivers. Nor, as far as I am aware, are there alluvial soils here, except perhaps immediately adjacent to the small brook. It would be better if this minor category were renamed or absorbed.</p> <p>J. Unenclosed Commons Third line of the first paragraph should read : .....’poor quality soils developed on gravels derived from the adjoining Malvern ridge’. (i.e. it is not the soils that have been eroded, as stated) .</p>	<p>Comment noted. Geoconservation is a priority through the AONB</p> <p>Comment noted</p> <p>Renewable energy is a priority throughout the AONB but this Landscape Character Type has particular opportunities for PV energy due to the filtered views of settlement.</p> <p>Comment noted. However, Landscape Character Type is part of a larger LCT identified across Herefordshire and is included here for consistency with other key documents.</p> <p>Comment noted. Text has been amended to more accurately describe the geodiversity.</p>
Sustainability Appraisal Comments	This could perhaps be strengthened by alluding (probably in point 1 of the sustainability objectives) to the importance sustaining the extant geological heritage. i.e. discouraging or not permitting further quarrying/gravel extraction. Otherwise, the Appraisal seems a sensible exercise.	comment noted but we do not feel that the Sustainability Appraisal needs changing in this respect
Specific comments	Sandstone Estatelands Future landscape opportunities – questioned whether elm was a characteristic elements of hedgerows.	We have confirmed that elm is a characteristic species of hedgerow.

	<p>Landscape guidelines – 'maintain and manage all woodlands using traditional forestry management practices'</p>	<p>The woodland management guidelines comply with Forestry Commission guidance.</p>
	<p>Wooded Hills and Farmlands</p> <p>Overall landscape strategy – questioned the assessment of relatively poor condition. How is this defined?</p> <p>Landscape guidelines – manage/restore all remaining patches of semi-natural vegetation – add 'and bracken cover controlled or reduced' to the end of the para.</p> <ul style="list-style-type: none"> <li>• Landscape guidelines – Manage gamebirds to support sustainable woodland and hedgerow management – queried whether this was in accordance with the Game Conservancy Code of Shooting Practice where reference is also made to shoots that exceed the recommended densities of birds. Could we not just cite the Code, he asks?</li> </ul>	<p>This landscape has lost much diversity in the past, a fact which has informed the condition assessment. There is opportunity to enhance landscape condition through enhancing diversity and reducing intensity of management. The text acknowledges that positive management is being carried out in the landscape.</p> <p>Text added to acknowledge the importance of bracken control.</p> <p>The current text follows the Game Conservancy Code. As with other topics, such as woodland management and habitat creation, key advice has been included in the document.</p>
	<p>Principal Timbered Farmlands</p> <ul style="list-style-type: none"> <li>• Future landscape opportunities – worth saying what the opportunities are for diversifying the pasture resource, e.g. re-seeding?</li> <li>• Landscape guidelines – Promote the uptake of renewable, particularly solar energy – worth saying that panels may be particularly appropriate on new buildings.</li> </ul>	<p>This comment has been reflected in the guideline on pasture management.</p> <p>While this is certainly true, there is a need to encourage renewable energy generation on older buildings too. Therefore, no change has been made on this point.</p>
	<p>Principal Wooded Hills</p> <ul style="list-style-type: none"> <li>• Landscape guidelines – Manage gamebirds to support sustainable woodland and hedgerow management – same point as above.</li> </ul>	<p>The current text follows the Game Conservancy Code. As with other topics, such as woodland management and habitat creation, key advice has been included in the document.</p>



	<p>specifically referring to horses and their keepers, with no examples, are misleading and give a very distorted picture of horses, their owners and the owners' attitude towards the countryside. We think these inaccuracies should be removed from the draft.</p> <p>Our additional concern was/is that the Landscape Strategy could at some indeterminate future date become an SPD...we will send a copy of this letter to the appropriate department at Herefordshire County Council with the observation that our acceptance of your amended draft should not be taken by the Council as an acceptance of its subsequent mutation into an SPD. Any attempt to do so will be met with the utmost opposition.</p>	<p>We believe that the document is unlikely to be adopted as an SPD because it relates only to a small part of the administrative zones of local authorities in this area. However, ultimately it is for local authorities to decide how they wish to use the document. The Strategy has been developed in accordance with the agreed Management Plan for the Malvern Hills AONB and has been produced as a genuine attempt to help landowners and decision makers to conserve and enhance the natural beauty of this nationally important landscape. In this respect we are very keen to see the document used as widely as possible and will be promoting it to this end.</p>
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