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Document 1 of 2:  
Management Plan  
Mid-term Review  
Report and  
Analysis

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**Malvern Hills  
AONB  
Partnership**

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Craggatak Consulting  
21 March 2017

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## Document 1: Management Plan Mid-term Review Report and Analysis

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The appendices supporting this report are in a separate document available from the AONB Unit

### 1. Background

- 1.1. Section 82 of the Countryside and Rights of Way (CRoW) Act 2000 establishes the primary purpose of Area of Outstanding Natural Beauty (AONB) designation as the conservation and enhancement of natural beauty. Section 85 of the CRoW Act places a duty on all public bodies to 'have regard' to the 'purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'. Under Section 89, the 'relevant local authorities' must prepare and publish a Management Plan for each AONB. The Management Plan is a statutory document and presents an agreed agenda for the AONB, setting out objectives and policies for the local authorities, statutory agencies and people who live and work in the area. The CRoW Act requires a formal review of an AONB Management Plan at intervals of not more than five years.
- 1.2. Launched in April 2014, the current Malvern Hills AONB Management Plan is due to end in March 2019. It is the intention that a full review will take place during 2018 leading to the production of a revised management plan from April 2019. In the meantime, there is a need for a simple mid-term review to check on the implementation of the management plan.

### Study Brief

- 1.3. The objectives of the brief are to:
  - To summarise progress in meeting the objectives and policies of the current management plan.
  - To identify objectives and policies against which little or no progress has been made.
  - To map management plan objectives and policies against the current priorities of a range of key partner bodies.
  - To identify any new policy drivers (not present at the time of producing the management plan) which are particularly relevant to the work of the AONB Partnership.
  - To provide a renewed focus for the delivery of the second part of the current management plan.

The intention is not to review processes such as action planning and monitoring or the efficacy of partnership working. This will take place as part of the full review.

## Project Constraints

- 1.4. Craggatak Consulting prepared this report in conjunction with the staff from the Malvern Hills Area of Outstanding Natural Beauty Unit. The study is a quick desk-based exercise using only easily available public information secured from websites or the AONB Unit. We searched from the publication of the AONB Management Plan (April 2014) to December 2016. The instruction was not to make any direct contact with partner organisations, as the need for their time will be during the quinquennial review of the management plan during 2018. Because of time constraints, we only consider how the management plan supports or influences the partners' corporate leaders. We feel that this is an effective test of the implementation of the AONB management plan. The intent is to give a quick heads-up on the implementation of the management plan; it is not a comprehensive assessment. Analysis is by a simple yes/no test, there is no attempt to weight scores or assess the relative worth of priorities or actions.

## Management Plan

- 1.5. The plan sets out a framework that gives guidance and direction towards achieving the long term Vision for the Malvern Hills AONB. A cascade of objectives and policies underpins the Management Plan. Twelve topics are grouped under three inter-related themes:
1. The natural and cultural environment
    - Landscape
    - Geodiversity
    - Biodiversity
    - Historic environment
    - Farming and forestry
  2. Community life
    - Living and working
    - Built development
    - Tourism
    - Transport
  3. Enjoying and understanding
    - Recreation and access
    - Information and interpretation
    - Volunteering
- 1.6. The Management Plan contains 14 objectives and 76 policies across these themes. The full list of objectives and policies is contained in Document 2 - Appendix 1

## Malvern Hills AONB Partners

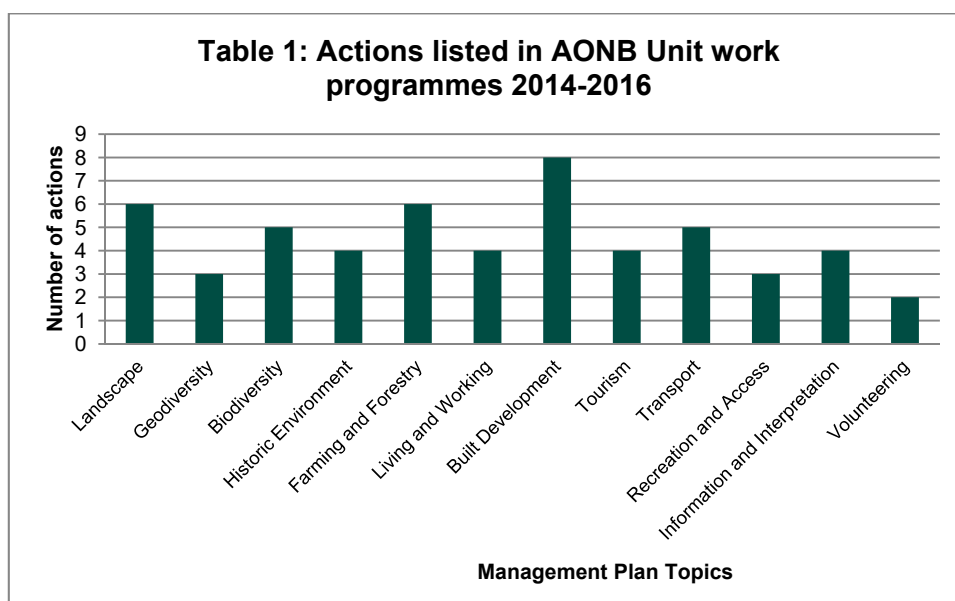
- 1.7. The partners selected for this study were:
- Campaign for Protection of Rural England
  - Country Land and Business Association
  - Defra

- Forest of Dean District Council
- Forestry Commission
- Gloucestershire County Council
- Herefordshire and Worcestershire Earth Heritage Trust
- Herefordshire Association of Local Councils
- Herefordshire Council
- Herefordshire Local Access Forum
- Historic England
- Malvern Hills Conservators
- Malvern Hills District Council
- National Farmers Union
- Natural England
- Visit Herefordshire/Destination Worcestershire
- Worcestershire Association of Local Councils
- Worcestershire County Council

- 1.8. These are the bodies currently represented on the AONB Partnership. In Document 2 - Appendix 2, we show their high-level priorities and strategic objectives, where listed on their websites. In a few case, it was not possible to find this information in time. Lying beneath these high-level priorities there are a wide range of policies actions. Some are achieving the aspirations of the management plan but they are not a part of this study.
- 1.9. There will be other important partners but the project timescale and criteria requires a simple approach at this time.

## 2. Progress in delivering the current management plan

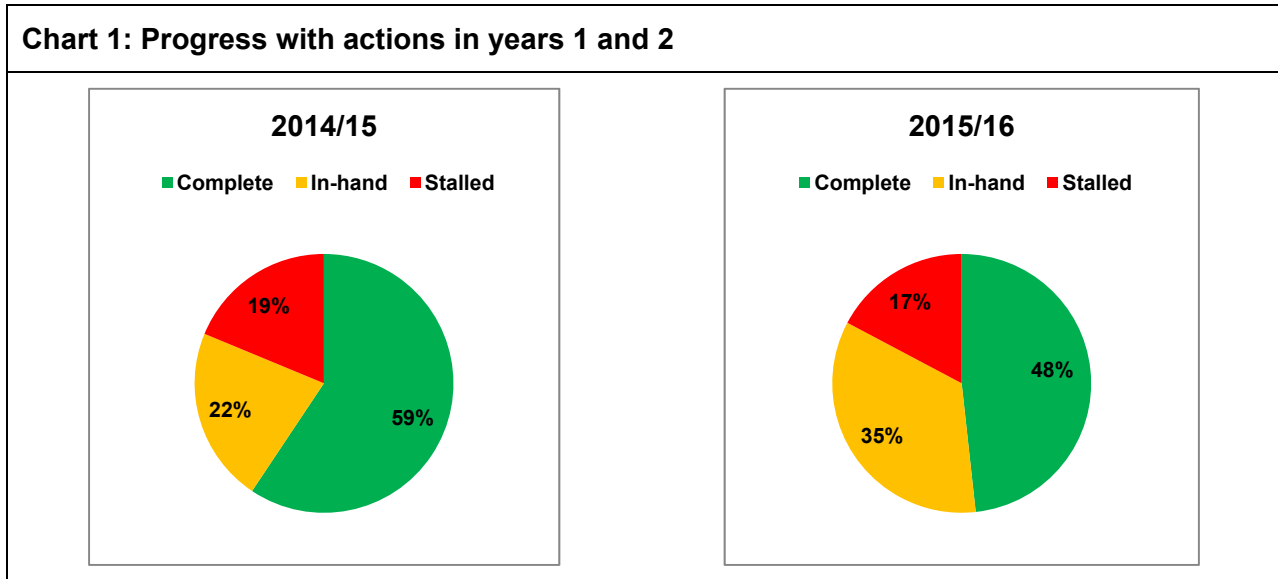
- 2.1. The AONB management plan (2014-2019) presents 76 policies. In the AONB Unit work programmes for the period 1 April 2014 – 31 December 2016, 120 actions were set out against 54 of these policies (71%)<sup>1</sup>. Table 1 shows the spread of these actions across the twelve topics in the management plan.



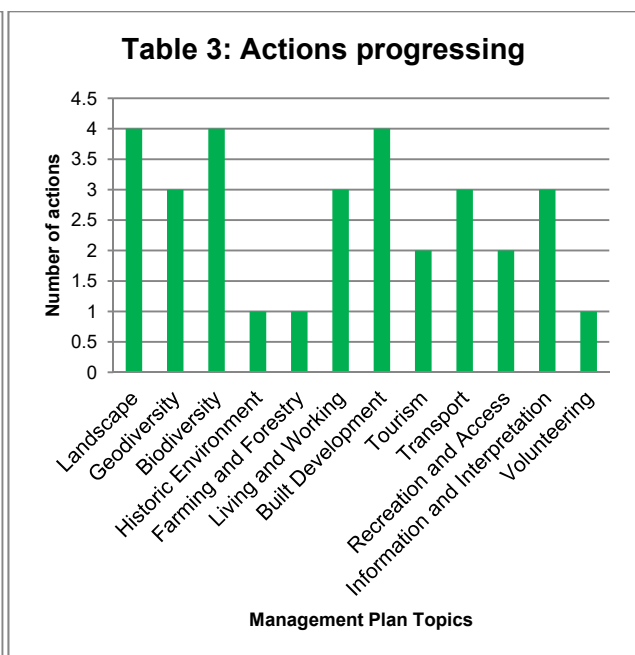
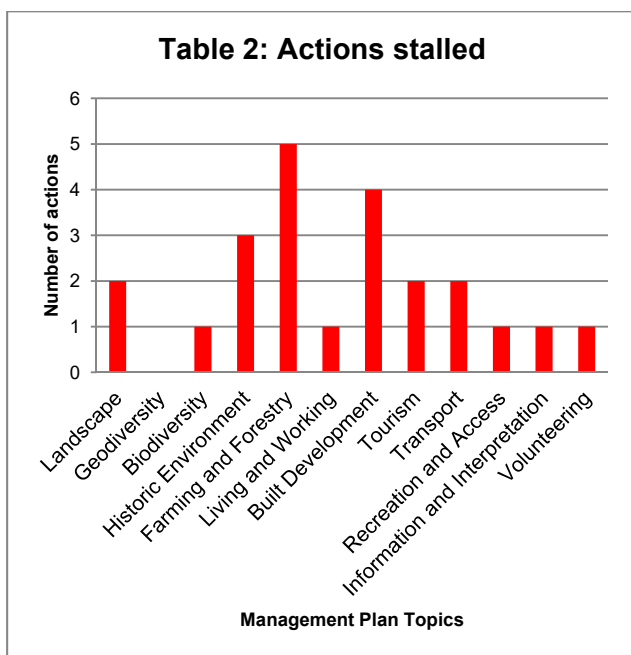
<sup>1</sup> Document 2 – Appendix 1 sets out the actions.

Clearly, the greatest intent was in Built Development, Landscape and Farming & Forestry; the least in Volunteering. However, each topic area received action within that time-period.

- 2.2. Analysis of internal progress reports completed in 2014/15 and 2015/16 (see chart 1) illustrate the completion or partial completion ('in-hand') of a high proportion of actions. However, they also show that progress was not made ('stalled') in 19% and 17% of cases respectively. Reasons given for this vary. Sometimes it is because reaching an agreement with a partner is taking longer than expected, or it might be that implementation is delayed by a third party. In addition, sometimes there are unexpected problems to solve. Complete figures for delivery of actions in 2016/17 were not available at the time of writing.

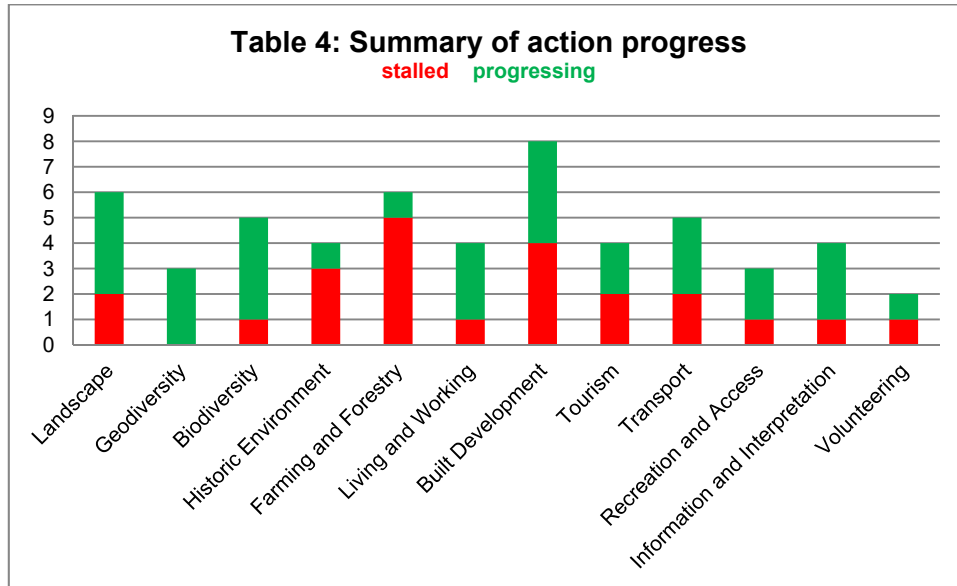


- 2.3. In Table 2, we show the spread of the actions across the topics that did not progress or are not progressing ('stalled'), based on all data for the period April 2014 – December 2016. The topics with the greatest number of stalled actions are Farming & Forestry, Built development and the Historic Environment. It is worth noting that only in Geodiversity are there no delays.

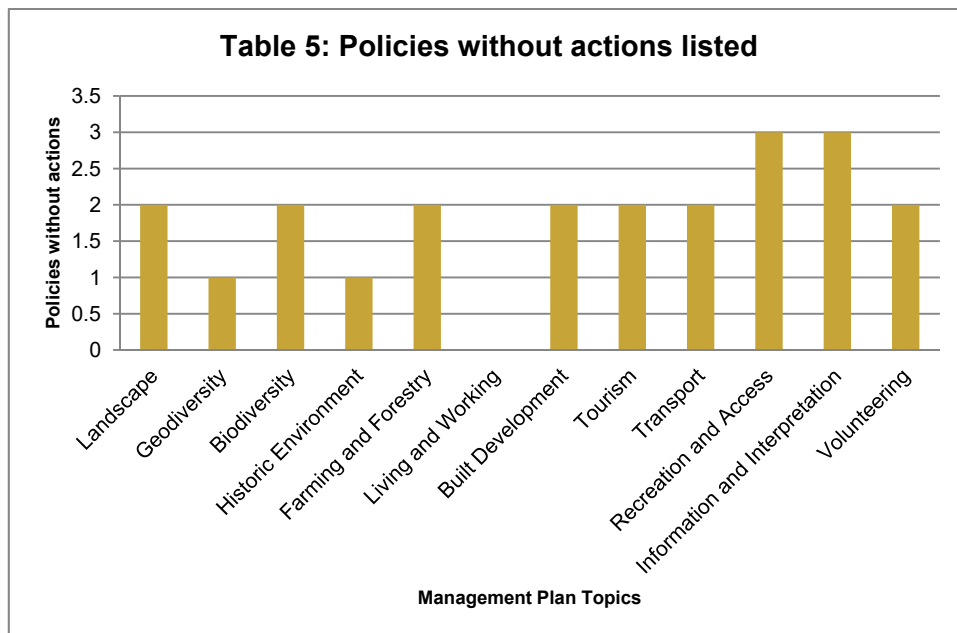


2.4. Table 3 shows where actions have been completed (2014-15 and 2015-16) or are progressing (2016-17). In this table, there is a much more even spread across the topics associated with natural beauty and social cohesion. This reflects the purposes of AONB designation.

2.5. Table 4 combines the data in Tables 2 and 3 to mirror Table 1.



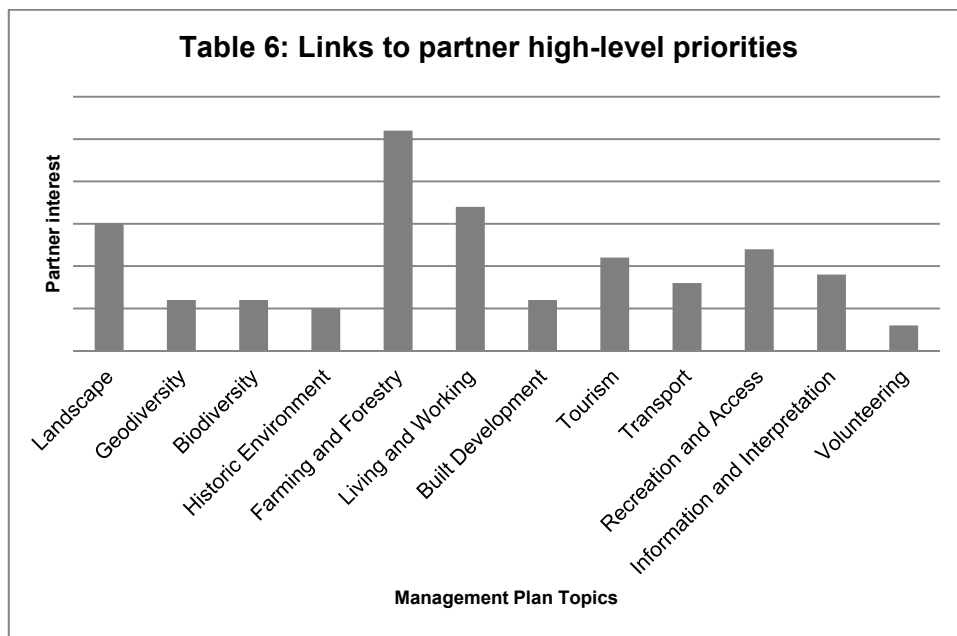
2.6. The tables above hide one aspect of the delivery of the management plan. Analysis shows that 29% of the AONB policies do not have any assigned actions. Table 5 shows the spread of policies that do not yet have any actions.



2.7. All the policies in Living & Working have had at least one action assigned in the first three years of the management plan. In every other topic area, there are some policies without actions. The greatest gap is in those topics dealing with enjoying and understanding the AONB.

### 3. Relationship between the management plan and partners’ corporate priorities

- 3.1. There has not been the time to scrutinise the actions of partners in any depth. Therefore, we have considered the priorities published by the partners (Document 2 – Appendix 2), for example, within corporate plans and business plans. We have also considered the strategic objectives set out in development plans. For this study, we looked for the obvious links between these priorities and the intentions of the AONB management plan policies. By this means, we hope to show how the management plan supports some of the priorities of the partners. We have not asked any partner whether they agree with our approach or analysis.
- 3.2. Our analysis was, by necessity, a simple yes/no test. We made a comparison of the narratives in the management plan with those in the partners’ documents. Many partners define the outcomes they want. We sought common language and similar intent. Table 6 shows the results of our policy mapping.



- 3.3. All topics have some links into the partner’s plans. Farming & Forestry stands out as having the strongest relevance to the partners, followed by Living & Working. The latter reflects the social support focus held by many of the partners. It is satisfying to see that Landscape also rates quite highly in partner interests, given the purposes of AONB designation. Our analysis also suggests that many partners are also likely to put a value on the topics that relate to visitor management, tourism, recreation and information. It is worth noting that the latter two have the fewest actions in the management plan.
- 3.4. The AONB Partnership has a choice when drawing conclusions from this chart and considering the final two years of implementation of the management plan. It can choose to invest in those topics given a priority by its partners, or it can choose to invest in those areas that appear to be of less interest to its partners. Consideration of these choices is in section five.

## Policies with no actions found

3.5. Table 7 sets out those AONB Management Plan policies with no obvious links to the high-level priorities of partners. These policies have also had no actions accorded to them over the first three years of the management plan. In considering this table it should be stressed again that partner priorities are based on a quick assessment of documents such as corporate and business plans. That does not mean that policies in table 7 are necessarily unimportant to partners.

Management Policies with no AONB Actions and no links to the priorities of partners		
Biodiversity	BP6	Improve knowledge and understanding of the AONB's biodiversity, to enable evaluation of the effectiveness of policies and actions.
	BP7	Safeguard biodiversity from potential damaging impacts arising from development or other activities.
Built Development	BDP7	Farm-scale polytunnels for commercial use would not normally be an accepted form of development in the AONB. Where there is an essential need for such developments and no other suitable location is available outside the AONB, a whole farm approach should be taken to ensure an acceptable location, design, and scale.
	BDP10	Monitor the cumulative impact of small-scale development within the AONB and use data to inform the development or revision of relevant policy.
Tourism	TP4	Ensure that the tourism sector recognises the benefits of conserving and enhancing the special qualities of the AONB and reflects this in policy and practice.
	TP5	Develop more collaborative and joined-up working between public, private and voluntary sector tourism organisations across the AONB, enabling greater overall efficiency and use of resources.
Transport	TRP3	Encourage the reuse and refurbishment of appropriate highway furniture and fittings to strengthen the special character of the AONB.
Recreation and Access	RP1	Pursue appropriate opportunities to spread recreational use to those areas which can sustain it and which will benefit from it, ensuring the provision of suitable infrastructure.
	RP2	Increase the range of organised activities through which people can learn about the AONB.
Information and Interpretation	IP5	Raise awareness of 'being in the Malvern Hills' as a special place to encourage sustainable activity
	IP6	Enhance local distinctiveness through the maintenance and restoration of appropriate signs and through sign removal where appropriate
Volunteering	VP3	Develop and support networks of volunteers able to assist in specialist data collection.
	VP4	Encourage Parish Councils to achieve high standards in working closely with voluntary and community groups and meeting local needs and aspirations.

3.6. The AONB Partnership has a choice when drawing conclusions from this table. It can choose to attach future actions to these policies; it can seek out actions achieving the management plan by third parties; or it can decide that there is no need for actions. Consideration of these choices is in section five.



## 4. Further policy drivers for 2019

4.1. The brief for this study asks us to identify any new policy drivers, not present at the time of producing the management plan, which are particularly relevant to the work of the AONB Partnership. We have approached this task by scanning material produced by the Government and its agencies, and professional journals. By conducting a word-search of all the policies in the partners' documents referred to in section three of this report and comparing with the management plan policies, we completed a gap analysis study.

4.2. There is one big new issue not previously considered:

- **Brexit** – Understanding and managing the implications for land management and environmental regulation of the UK leaving the European Union.

When the AONB Partnership is drafting the next management plan, it is possible that the shape of Brexit will be emerging. There will be an effect on the management of the AONB and it will be necessary to invest time and skill to secure the resources that the Malvern Hills AONB will need.

4.3. Other topics that emerge are not wholly new but they will require a greater prominence in the new plan. The European Environment Agency<sup>2</sup> set out three key areas to address by 2050:

- **protecting the natural capital** that supports economic prosperity and human well-being;
- stimulating **resource-efficient**, low-carbon economic and social development;
- **safeguarding people** from environmental health risks.

These priorities chime with the needs set out by many local partners. The current management plan discusses these issues but does not develop them as strong themes.

1.10. The word-search exercise threw up an interesting list of additional items including:

- Climate change
- Disability, access and empowerment
- Education in the outdoors
- Empowering sustainable development
- Farm diversification
- Flooding and its mitigation
- Job creation
- Landscape resilience
- Links to Local Enterprise Partnerships
- Recycling and litter

1.11. The current management plan touches on these topics but they matter to the partners and their communities and the next plan could develop a greater emphasis on them.

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<sup>2</sup> European Environment Agency The European Environment State and Outlook 2015

## 5. Focus for delivery up to 2019

5.1. There is a well-balanced suite of actions for the current AONB Management plan, though the Enjoyment and Understanding theme is under-represented. When developing and implementing the last two annual work programmes, the AONB Partnership can choose to change the balance if it so wishes. It can invest in those topics given a priority by its partners, or it can choose to invest in those areas of least interest to its partners.

- Linking to the priorities of partners will help build friendships by pooling resources.
- Investing in those areas of least interest to its partners can reduce duplication and deliver additional benefits. The Partnership can fill the gaps.

It is for the Partnership to decide.

5.2. However, having nearly 30% of policies with no actions attached begs a question. Are these policies serving a purpose?

5.3. Partners will themselves be achieving some of the policies and this study was not to carry out a detailed search. The AONB Partnership can choose to attach future actions to these policies; it can seek out third parties who are achieving the actions; or it can decide that there is no need for actions.

- In attaching new actions to the policies, it is worth noting the delays and problems in implementing many of the current actions. The Partnership must take account of the limitations of capacity and understand the extent to which that capacity is changing.
- Identifying those third parties who are implementing the management plan is important, not least to give credit where it is due. There is the risk of consultation over-load, so any work in this area should be low-key until the preparation of the new management plan is underway.
- A clear statement that a few named policies do not need specific actions can avoid unnecessary stress for those responsible for implementing the plan and for monitoring its delivery. If the Partnership takes this route, it is good practice to give a simple explanation to justify the decision.

5.4. Whilst there is time for quiet contemplation, the AONB Partnership may wish to consider reducing the number of policies that appear in the next plan. Policies fall into two categories, regulatory and enabling. The AONB is likely to need its regulatory policies and the action is to monitor their application. The enabling policies are aspirational. They should be stretching but realistic. Plans with a tight number of well-crafted policies, all of which have achievable actions, may be more appropriate in the current era.

**Paul Tiplady**  
Principal



21<sup>th</sup> March 2017