

Appendix 3 - Malvern Hills AONB Management Plan Review - selection of comments received		
Mgt Plan Ref	Comment	Changes
Introduction - 1.11	AONBs are currently being reviewed by government, though I am not sure if the MP could/ should do more than acknowledge this and refer to the terms of the review in brief, simply as a matter of information.	Text box added to paragraph 1.11. ---- "Defra is considering whether there is scope for the current network of AONBs and National Parks in England to expand, in either size or number. It will report on the options for improving access to these landscapes, and on the support needed by those who live and work in them. It will also explore the role these designations have in growing the rural economy. The review will report in 2019. This is after the adoption and publication of this Management Plan; there may be a need to reassess our policy positions in the light of the review's findings."
Introduction - 1.15 Brexit	The content of paragraph 1.15 covering 'Brexit' will have to be reviewed right up until just before adoption of the plan for obvious reasons. Also paragraph 2.53 and others where exit from the EU is mentioned.	Noted and a sentence added to paragraph 1.16 : "As the exit from the European Union will be after the publication of this Management Plan, there may be a need to reassess the policy positions once the new trading position is known."
Introduction - 1.17	the statement that 'the long-term effects of climate change are not clear' is not really correct as scientists are in good agreement about this now even the severity of likely change is more certain now too – see https://www.gov.uk/guidance/climate-change-explained which is worth referencing. Better to say 'The long-term effects of climate change are becoming increasingly agreed upon and weather patterns are likely to change and average temperatures will rise'. Paragraphs 1.18 and 1.19 are fine to stay as they are.	Noted and changed. New text: Because of increased carbon dioxide in the atmosphere, global warming is now a serious consideration for all policy makers. There is an emerging consensus on the long-term effects of climate change ; weather patterns are likely to change and average temperatures will rise.

Introduction - 1.20 diagram	<p>Paragraph 1.20 would be better with the addition of a diagram on natural capital, e.g. similar to that shown on page 2 of the latest version of the Cotswolds AONB Management Plan 2018-2023 here https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/ or better Box 1 in the parliamentary POST Note 542 at https://www.parliament.uk/postnotes .Services that flow from the Natural Capital stock are ecosystem services and abiotic services and not just the former. Third sentence of the paragraph therefore needs changing.</p>	Text changed and a diagram added
Monitoring - 1.35-1.38	<p>Monitoring as set out in 1.35-1.38 shows the excellent work that has been done to establish monitoring systems that can give an indication of the state of the AONB. It has also shown, in the case of the condition of Scheduled Ancient Monuments, the benefits of such monitoring systems in that we have seen all monuments achieve a satisfactory condition over the last 10 years. However, as recognised later in section 2.84, there is a need to ensure data exists for undesignated heritage assets to guide the priorities for conservation and enhancement in the historic environment. We therefore advocate that the Monitoring section should also include reference to developing new condition indicators that can address this current deficit and assist in monitoring the impact of changes in support over the coming years. Potential tools for monitoring undesignated heritage assets could be the SHINE (Selected Heritage Inventory for Natural England) dataset developed for informing the Countryside Stewardship schemes. These record definable and manageable heritage assets in the countryside and information will exist as to whether they are included in a Stewardship scheme and whether they are positively managed in those schemes. We would be happy to work with you in exploring this and other tools that could help strengthen our evidence base for the historic environment.</p>	Noted. New text added to paragraph 1.35, bullet point on condition monitoring to read: "In particular, there is a need to improve the monitoring of undesignated heritage assets."

Monitoring	On page 9 it is stressed that development in AONBs is significantly increasing and that regulation is not effective. It may be worth adding a new monitoring element related to development impact on natural capital in the AONB, which includes amenity values. The Natural Capital Planning Tool (NCPT) could be used for this purpose. www.NCPTool.com .	Text added to paragraph 1.24 to read: "The Natural Capital Planning Tool (NCPT) is a free site assessment tool developed specifically for the planning context. The NCPT allows the indicative but systematic assessment of the likely impact of proposed plans and developments on Natural Capital and the ecosystem services it provides. This tool can support a monitoring programme. " We have also added a reference in 1.35 monitoring.
Landscape - 2.17	The biggest problem for hedgerow trees is the landowners' liability for them. Most farmers just cut them down to reduce the liability. Since it is impossible to know if they are dangerous, a change in the law is necessary.	noted: a comment added to paragraph 2.17 -"Small-scale changes may result from shifts in land use, for example hedgerow boundaries becoming gappy where they no longer serve a functional purpose and hedgerow trees being regarded as a nuisance because they cast shade on arable crops or are perceived as a danger to a highway."
Landscape - 2.20 Polytunnels	The reference to Herefordshire Council's polytunnel guidance (Para 2.20 page 18) should be updated to refer to the June 2018 revised guidance which can be found at: https://www.herefordshire.gov.uk/download/downloads/id/14577/polytunnels_planning_guide_2018.pdf You may like to consider any revisions to BDP9 against this revised guidance which gives priority to protecting the natural beauty of AONBs where economic benefits are being weighed against landscape impact.	noted and agreed to update issues, policy and footnote

Biodiversity - 2.50 Protected Sites	The paragraph refers to there being little change in condition of the SSSI. Although this is true, it should be noted that there hasn't been another assessment since 2013 on most of the units as they are on a 6 year cycle. It should also be noted that Natural England have designated a new SSSI in 2018 within the AONB. Malvern Common SSSI is about to go for confirmation, but was notified in May 2018.	Noted and footnote added
Biodiversity - 2.74	rewilding - perhaps mention that any re-wilded land would be lacking the keystone species it would have originally had - e.g. auroch and tarpan and so would not function naturally. Man's livestock therefore provide a partial surrogate through conservation grazing.	Noted, an addition to 2.74 reads: "... and the habitats within. However, any re-wilded land would be lacking the original keystone species, such as the auroch (a very large species of cattle) and so would not function naturally. Our livestock provide a partial surrogate through conservation grazing. Active management shapes ..."
Farming and Forestry - 2.85	2.6 and throughout plan - woodland management and forestry need to be distinguished, as do foresters and woodsmen/women - historic differences between who owned and who worked the woodlands; woodland management to meet the needs of the community vs industrial management/monoculture/exotics for investment/profit, and use elsewhere.	First paragraph amended to read: "2.85. Farming and forestry still represent the significant forms of land management in the AONB. They continue to provide local jobs and income. There are different scales and forms of activity in farming, ranging from small-holders who consume their own produce to those who operate commercially with a strong profit motive. Equally, forestry generally refers to larger scale commercial management operations whilst woodland management has a very long tradition of yielding valuable products for local use."

Living and working - 3.12	The MP refers to NDPs, it may be worth noting that the various Local Planning Authorities have a different approach in respect of these, most notably Hereford where they are more actively encouraged so that they can in effect form a detailed Local Plan for much of that area without the detail (eg FoDDC Allocations Plan) being provided by the District or other LPA.	We have added a foot note to make this point. In response to other consultees, we have added a bullet point about housing allocations.
Living and working - 3.18	Gradually a band of landscape gardeners in the area are altering the landscape seen across Colwall. Grass is being removed in favour of gravel gardens, tarmac drives, and inappropriate plantings of non native trees. There is also an increase of brick pavier front gardens denuded of all vegetation, again with ornate metal and gold high gates (often gating a bungalow) or plinths with cement lions. The cumulative effect of this over the years has altered Colwall beyond repair, the loss of hedgerows in particular is quite evident as you look down onto Colwall from the hills. I believe new house owners should be given information in pamphlet form with do's and don'ts within an AONB. As far as the landscape gardeners who are 'designing' these gravelled gardens which butt up to the hills are concerned, there should be a conference/meeting with them all to explain that their work and their designs are a significant part of maintaining the AONB and AOSSI. They may win medals at Chelsea and 3 Counties, but they need to understand the ecological impact of their work.	Noted - there is now a leaflet for new property owners in the AONB; it does touch on the problems associated with incremental change but could be expanded re. gardens. However, unless it is development, there are few controls of what people can do within the curtilage of their property so would need to be a case of education/information. The issues raised would make for an interesting and informative conference.
Built development - 3.34	local distinctiveness and design- these are important issues everywhere but probably especially in more sensitive areas such as AoNBs. The new NPPF does help to a degree by its emphasis on good design and quality, and the partnership's guidance too. There is inevitably scope for more guidance and for Local Listing (non designated heritage assets). NDPs can assist with character assessments here and Local Plans can and may contain useful policies.	noted and agreed

<p>Built development - 3.35 and 3.36</p>	<p>I applaud this inclusion. Please include something about residents mowing land which is effectively not theirs i.e. common land bordering their property and verges to the point of grass monoculture devoid of biological diversity. Please include that in some way Local parish councils should be made accountable/answerable for their decision to allow the removal of hedgerows and Malvern stone walls to be replaced by lap board fencing, as seen on the route from the Wyche cutting to Barton Court and Chase Road in Upper Colwall. Colwall is a 'fenced community'.</p>	<p>Noted, common land is essentially private land that a group of people have rights over. It is for the land owner to decide if there is a misuse of their land. Road verges are usually a highway matter and we touch on this in paragraph 3.93. Not sure what powers the Parish councils would use to remove hedgerows and walls, it is either the landowner or, if it is development, it is the local planning authority. The planning policies are quite strong on preserving local character.</p>
<p>Built development - 3.36</p>	<p>Should there be a policy about monitoring the impacts of cumulative development as in the 2014-19 Management plan (BDP10)? In paragraph 3.36 this issue is explained and is cross referenced to BDP3 but this policy does not specifically address the issue.</p>	<p>Now a policy to read : "The cumulative impact of small-scale change and development will be monitored. Data gathered will be used to inform decisions and to revise and/or develop policy."</p>
<p>Built development - 3.39</p>	<p>Although permitted development and Prior notification rules vary (many of the relaxed prior Approvals do not apply in AoNB), the potential impact from development within and around is significant. The setting of the AoNB in some areas is especially vulnerable to development which stems from the relaxation of PD in these areas. Development Plans are able to use "locally valued landscapes" as a tool and these may be able to protect the setting of AoNBs by acting as buffers. FoDDC have a few such designations which are in a newly adopted plan though none adjacent to either AoNB (May Hill, policy AP14). The MP may wish to encourage the various LPs and NDPs around its boundaries to consider similar policies.</p>	<p>We have added a new policy (BDP14) to read: "In the setting of the AONB, Local Planning Authorities should consider identifying locally important landscape areas to conserve the special qualities and features of the AONB and their enjoyment by people"</p>

<p>Built development - 3.52</p>	<p>statement to use loose material from former quarries - helpful - limited winning however is potentially a bit of an issue for us if it rekindles ideas amongst some landowners of their dormant rights to quarry. minerals policy in WCC is set against it. how Herefordshire Council might respond may differ. perhaps winning of new materials should be restricted?</p>	<p>Means 3.52 Noted and we have added "does not impact on special features and is subject to all relevant consenting procedures." to the sentence to reinforce the point about minerals consent.</p>
<p>Transport and accessibility - 3.89</p>	<p>Movement of freight through sensitive communities at night should be included. This has been happening for many years. Freight transporters cut through Colwall on the road from Malvern to Ledbury at night. This is one of several factors which appear to be disturbing our bat population, as well as the sleep patterns of the human population.</p>	<p>We understand the concern and discuss the affect on tranquillity in paragraph 3.89 and in Policy TRP6. We have added "Vehicle movements at night are particularly intrusive, disturbing residents and wildlife alike."</p>
<p>Buit Environment</p>	<p>Maybe worth adding a policy to enhance natural; capital value due to development: environmental/natural capital net-gains as per NPPF but in a stronger phrasing. Also: using the duty to cooperate to ensure that development outside the AONB does not change the character of the AONB and views from it.</p>	<p>We have added a key action under the planning policies to: "Explore the use of the Natural Capital Planning Tool to assess development proposals for their likely impact on the AONB's Natural Capital and the ecosystem services it provides to people."</p>
<p>Enjoying and Understanding</p>	<p>Someone needs to mathematically 'model' the impact over time of activities such as mountain biking on the hills. You rarely see horses on the hills now, perhaps it is time to remove mountain bikes from certain areas where there are children and adults walking. I am particularly worried about the grooves bikers have physically dug into the ramparts of British Camp where they practise their downhill speed. Once further weathering takes place the ramparts will subside.</p>	<p>Noted. We have recently carried out visitor survey with the results helping us to scope the problem. We do not own or manage land. However, a partnership approach is behind practical efforts to prevent damage of key monuments such as British Camp.</p>

Information and Interpretation	More information is needed around the Malverns on water and geology. Signage is a very good way to display information of note. More maps are required of access in the hills. Better information on websites. Geocaching is a great way to share info with younger generations	Noted - we have policies to coordinate interpretation and raise awareness but also to ensure only that which is needed is put into the landscape. Too many signs can degrade the special qualities we are trying to explain.
Volunteering	Make volunteering easier by booking online? A number of rules etc which put people off ? You have to have rules and regs admitted. Certain things stop action being taken on say quarry clearance days. Have more champions who understand the issues and what is important features in quarries so volunteers know what work is required and protected features are protected from accidental damage during clearance works. Have more company away days to get jobs done. Liaise more with local companies to get volunteers for this	These are very good points but cannot be addressed within the management plan, they do link into actions and we will endeavour to address them in this context.
Actions	Actions are lacking - research and promotion fine. but where's the grant-aiding, advising, facilitating, sign-posting and other supporting actions that will help landowners to do what you you're after.	The point is understood but actions are to be done by many stakeholders. The management plan does not list all the actions need to implement all the policies, it just states a few key actions to start the implementation programme. Partners business plans will pick up the additional actions.

General	Overall, Natural England is satisfied with the management plan. We were pleased to note the references to the Government's 25 year Environment Plan and the revised National Planning Policy Framework (2018). A clear ambition to deliver the Lawton principles has been set out and thought has been given to the surrounding landscapes, towns and countryside and the connectivity and connections both into and out of the AONB, whilst keeping the primary purposes of AONB designation at the heart of the plan. It would be helpful to have more clarity and thinking around key actions and their prioritisation. Some of the objectives and policies, such as in the farming and forestry and the living and working sections, didn't seem to have any actions attached at all. Other actions are non- specific and read more like policies.	Noted and will review. The management plan does not list all the actions need to implement all the policies, it just states a few key actions to start the implementation programme. We have ensured that there are some actions in each section. Partners business plans will pick up the additional actions.
General	The current management plan draft is 98 pages long which is too long especially for a small AONB. Links to on-line background information should be used as much as possible especially as it will be read by most as a digital document. Perhaps the 'About AONBs' part of the introduction should be removed to an appendix or just replaced with the link to the National Association of AONBs web page here http://www.landscapesforlife.org.uk/about-aonbs/	Nice to use links etc if it is an on-line document. But as a printed document the essential information must in the text.
General	We consider the draft Management Plan Review to be an evidently comprehensive document which is easy to read , eloquently tells a story and presents a strong image and vision for the AONB going forwards. Given its length, we suggest that it could benefit from an annexe approach for the policies which would provide for a clearer structure and easier cross-referencing with other plan making documents.	noted: The policies need to be in the plan for the general reader (not everyone reads the whole plan) but it possible to provide a standalone short document that just has the vision and policies for technical support.
General	Need to discuss importance of Malvern springs and spouts. Spring water which originates as groundwater out of the Malvern Hills igneous rocks. Should pollution of water be mentioned? Nothing in the entire report about pollution and water quality ? This is an omission. Related to land use also. Farming and forestry works can affect water quality - use of chemicals and fuels/ oils can all contaminate	Policy FP1 addresses water management and water pollution. No text change

