

# Malvern Hills National Landscape Management Plan 2025-30

## Responses to the consultation draft Management Plan by topic

Public consultation took place between Wednesday 14<sup>th</sup> August and Saturday 26<sup>th</sup> October 2024

### General comments from consultee

General support for the plan  
 Spelling errors corrected and conventions adjusted  
 Adjusted grammatical errors where possible.  
 Need to source references and evidence  
 Need to consider the relationships with Local Plans (and viability testing)  
 Need to identify stakeholders who agree (or are expected) to deliver policies and actions.  
 Why asked to delete reference to 100 years?  
 Would have liked to see something about the role of the landscape of the Malvern Hills in educating our youth in understanding and appreciating our environment and how to conserve it. Also, about learning about teamwork and leadership in a challenging but relatively safe environment [Picked up in Health & Wellbeing Policy PE1.2]  
 X Parish Council thanks the MHNL Team for the inclusion in Management Plan Workshops, as held in May, and the opportunity to make some detailed comments and contributions to the developing Plan. We also thank you for the chance to respond to the Draft of the MHNL Management Plan 2025-2030 Consultation.  
 X Parish Council supports the vision, outcomes and policies set out in the Plan.

### 1 Introduction Context

1.3 asks for the text to be changed from the active to the passive sense. [Reject in order to maintain plain English – keep to the active sense]  
 1.4 asks for “with” to be changed to “within”. [Rejected, no LA is smaller than the NL – they cannot be within]  
 1.9 wants to change “of” to “from”. [Rejected because a material change in relationships]  
 1.12 this para on MHT could be improved – the Trust will help. [Accepted and email sent but there is a time constraint]  
 1.12 As well as the Trust, it may be useful it may be useful to record a “Top 10” of landowner/land use to understand where the biggest contributions can be made (e.g. parks/commons, burial grounds, forestry, farm estates, biggest land owners etc.) [Rejected – we do not list all the stakeholders, too many]  
 1.12 Not quite sure why the MHT has its own section. It sort of looks like a subsection of “Who will deliver the Management Plan” but this is not immediately obvious. It should sit alongside brief descriptions of other JAC members, or be framed in that context. That is, before the 'Duty to further the purpose of designation' sub section. Alternatively it, and references to LPAs etc, could sit under "Working Together" or "Working in Partnership" [Rejected. MHT has its own section because there is a common confusion in the public's mind over the role of the JAC and the MHT]  
 1.13 delete “The JAC is unable to deliver the plan by itself” [done]  
 1.15 suggest - This makes it very challenging to develop and deliver a consistent approach to conserving and enhancing the natural beauty of the area, including its special qualities and increasing the understanding and enjoyment of them. [added]  
 1.20/21 To what extent can partners be "allocated" actions, or have certain actions for which (perhaps under the Duty to Further) they would be expected to be proactively incorporating into plans and to what extent can partners be held to account? [By annual reporting and action by Defra and Natural England]  
 Indicators - Woodland expansion - is it Nature indicator 1 or Climate indicator 8 [A national indicator set by Defra; and Defra place woodland under climate]

### Last review Structure/use

No comments

1.25 bullet 5 - As noted previously, this seems to be a challenging position for the NLP - without any ability to enforce/allocate, delivery is reliant on proactive engagement by other parties who have several targets/obligations which may directly provide a conflict of interest with the vision and outcomes in the NL Mgt Plan (e.g. housing targets) [We ask stakeholders to buy into the plan]  
 1.26 Do we need something to justify these as the key issues? Link to later section. [These issues are priorities set by Defra in their Environmental Improvement Plan. Changed to headline issues – we then show topic specific issues in each section]  
 1.28 bullet 2 - Not sure they represent the policy for the responsible local authorities? As per point 3, they should guide and influence the development of the policies of those bodies, but are not the policies owned by such in themselves. Perhaps therefore delete the second half of the sentence? [The Crow Act S 89 states explicitly that the plan formulates the policies of the constituent authorities for the area and their management of it. Text adjusted]

**2 MHNL  
Special  
qualities**

1.28 closing sentence - Suggest adding to the end of the sentence "and provide clarity on the interpretation of the policies in decision making" [added]  
 1.29 "taken into account" rather than "considered" [considered is plain English – no change]  
 1.29 suggest - proposed in the National Landscape and its setting, the developer [agreed]  
 1.30 suggest – evidence new and revised local plan policies [agreed]  
 Asks why key issues appear before Special Qualities. [We are following national guidance]  
 1.30 does not like "aspirational". [Standard text from national guidance – no change]  
 1.31 Asks for source [added]  
 1.32 change "it" to "policies and actions". [agreed]

2.4 – special qualities – how order chosen, how wording chosen, could be presented more 'strongly' – following the nature, climate, people, place themes, with a consistent commentary (eg Wye Valley mgmt. plan table 8, although noting that ecosystem goods and services isn't such a common assessment terminology now). Explain how this is different to the 'special features' described in each of the 4 policy sections.  
 [The wording is from the existing plan. Added text to clarify relationship between special qualities and special features]  
 The unique geology is undoubtedly the most special of the MHNL's 'special qualities' amend the following:  
 2.2 first sentence to read "The special quality of the Malvern Hills National Landscape lies in contrasts". [text amended]  
 2.2....geological variety, including a number of distinctive relict quarries. [text amended]  
 2.3: refers to the Worcestershire Way is as a "new recreation resource"; it has been in place for over 35 years. [deleted new]  
 2.3 add in text about the huge variation in holding size – smallholders to Eastnor Estate. Helps paint the picture of the land (England average farm size is 88ha). [rejected – interesting facts but not needed to make the case/not directly part of special qualities]  
 2.4 10th bullet. ....mudstones shales, and Ice Age deposits. [added]  
 2.4 Mention of local stone use in walls, infrastructure etc. [will consider]  
 2.4 Bullet 9 – nationally rare – are these identified anywhere? As they are a special feature this would be useful esp given the nature focus in this plan. [Text adjusted to clarify and justify]  
 2.4 The special qualities include a historic vernacular style of building and specimen tree- planting that adds to the distinctiveness of the settlements. In addition the 100+ springs and wells are a key component of the landscape and its history. [text added]  
 2.5 As well as tall buildings, there is an important balance to be struck regarding trees. Tree plantations are becoming increasingly important for biodiversity and climate change. They are also useful screening against noise. In the last half century however the landscape has been transformed by the uncontrolled spread of tree growth which has destroyed views for both inhabitants and visitors , and altered the distinctive character of the Hills. Because of this NA 1.5 Target 8 is too simplistic and completely inappropriate to local circumstances and should be rejected. If there are to be tree plantations, this should be somewhere away from the centre of the AONB where views can be preserved. [Noted – we cannot change the national targets but text adjusted in the plan to acknowledge the point]  
 2.5 change "part" to "role" [agreed]  
 2.6 Suggest adding reference here to land use change, agricultural use, built form, and also changes to texture as these may also be relevant (in addition to the movement, noise, odour, light, vibration and dust over a wide area that are listed here). [rejected, already implied by the text]  
 2.7 We note the recognition of the importance of maintaining a suitable setting, outside the area of the Plan. [Noted – adjustments made where appropriate]  
 2.7 – notes that there will be a revised NPPF by the end of 2024. [Noted – will revise text when the NPPF is published, it is only a consultation draft at the moment]  
 2.8 Yes, direct to relevant webpage which will be regularly updated.  
 2.10 Cotswolds ? [Now changed to Malvern Hills]

**Condition**

2.8: Include links to relevant webpages for the datasets; there is no need to include the full datasets within an appendix. Rather than a set of textual data, a few similar graphics with key indicators on your website would be more impactful and engaging. It would help to communicate the key issues and Nature Recovery Plan identified in 2.10 etc [Will just link to the website]  
 2.8 The linked table needs updating with datasets for heritage. Whilst the indicators for designated heritage assets are straight forward, there also needs to be some method for monitoring and assessing the wider heritage assets in the landscape. This could be by identifying the number of heritage assets in positive management, such as those in Stewardship schemes, or by the identification of a representative subset of undesignated heritage assets (such as moated sites and prehistoric enclosures) for targeted assessment, monitoring and positive management. [Agreed. Indicators are to be shown on a dedicated webpage and we will add to the list of indicators as and when resources allow and/or when these are made available to us– text amended]  
 There should be targeted monitoring on the Malvern Ridge where the greatest pressure exists. The condition survey of the Shire Ditch, published in 2006, should be repeated. [Noted]  
 2.8 Last sentence reads oddly. [re-drafted]

**Headline issues**

Pest and disease [Noted]  
Housing development; {not a headline issue - housing is picked up under topic issues}  
2.10 – Cotswolds changed to Malvern Hills  
2.11 We note the importance of managing climate change – Minor changes to text.  
Are concerns about contaminated river water an issue [dealt with in water]  
2.11 – Can accept first bullet, last line. Reword as Examples of the impacts include pest and diseases (ash dieback being a "more recent" and highly visible example); changing timings of seasons; low summer "water" flows; and damage to vegetation from high winds. [Done]  
Third bullet – climate "change" adaptation [changed]  
2.12 – fourth bullet – want "their land" to be changed to "land" [changed].

**3 30-years time**

**Vision**

Vision suggestion noted – [no change considered]  
Various comments about what to call the area – [will agree our conventions].  
"3.2 3rd bullet – add "and to make" – [done]  
3.3 No expansion likely in the near future so not mentioned.  
3.3 vision for nature, line 3 typo "non-native". [ Noted and changed]  
3.3 – nature has returned' it never left – consider re-phrasing. A good and interesting point – Discuss. Consider using 'priority habitats' rather than other adverbs 'major' 'emblematic' etc. – seems to make sense. [changed]  
3.3. Noted the comments on wilderness, "untidy" natural areas, "wildlife corridors" but no action necessary. Note calls for education.  
3.3 add "National Landscape" after Malvern Hills – [done]  
3.5 last sentence. A long-term issue is rock erosion (eg landslips, scree degradation, creep ) in the large quarries. So, suggest: ...Rock and soil erosion, pollution, .... [added]  
3.6 vision for climate, line 3. Re-order to read "...private vehicles to walking and cycling, public transport and electric vehicles." To identify priority of walking and cycling for health communities. [Done]  
3.6 & 7 – the vision for climate does not refer to renewable / sustainable energy generation... is this missing for a reason? [Text added]  
3.6 access is an issue. Wider adoption of EVs risks placing more emphasis on parking and charging spaces is a useful comment. And alongside the availability of electric bicycles and scooters, new forms of personal transport offer a potential healthier and low-emission alternative over the hilly terrain. [text added]  
3.6 "And others" - cannot see where it links to the text.  
Paragraph 3.7: we assume that the part-formed title between paragraphs 3.7 and 3.8 should be joined to the end of the title above paragraph 3.6. –[ no the layout is correct, water is a subset of the climate vision.]  
3.7 suggest second sentence should be "Flood risk is reduced through natural solutions which limit peak flows". [Good grammar would suggest either a comma or "that limit" – I have adopted the latter and added].  
3.9 First sentence change Malvern Hills to area – [done]  
3.10, first sentence delete "Hills" - done. Wants or enjoy to become and enjoy [rejected as this changes the meaning as it limits the experience to just residents].  
3.10 DISCUSS re 'need to or want to live' - Suggest caution with the inclusion of this. Evidence for people wanting to live in a NL can and has been used on occasion as justification for inappropriate development.[Text amended]  
3.12 wonders if flagbearer is better than torchbearer – [changed to flagbearer]  
3.12 do people know what regenerative tourism is? May need either definition here or reference to where the definition is [footnote added]  
3.13 In the first sentence, delete the second "the". Last sentence add "with" [i.e., visitors with a safe] – [agreed and done.]  
3.13 re 'a high-quality built environment that' Suggest adding "and sensitively and sustainably designed. [Text amended]  
3.13, line 4. ...commonplace and valued. The unique earth heritage, cultural and historic environments are in good.... [noted]

**Outcomes & polices**

**4 Nature**

## Nature & Biodiversity

4.2 The listing here of 'Nature topics' looks distinctly odd. In terms of scientific logic and chronology, a description and commentary on Geodiversity should logically precede Nature Recovery and Biodiversity, as geology underpins those themes. DISCUSS – we had this discussion last time. By process he is correct but Defra make Biodiversity their apex and they always put Geodiversity below it. [no change for this reason]

4.2 This whole section is repeated as 4.18 [4.18 deleted]

NA1.1 Again, natural processes need a mention. [Noted].

NA1.2 Cross reference to Biodiversity Net Gain might be possible but is it necessary? Suggestion to add "Proposals for development or land use change outside of the National Landscape, and most especially in its setting, should have regard to its impacts on biodiversity and habitats in the designated area." [agreed]

NA1.4 As well as managing grey squirrel, deer and crayfish, we suggest that consideration is given to establishing programmes to manage outcrops of invasive non-native plants, including Japanese Knotweed and buddleia. [new bullet]... Could new housing and other developments be encouraged to create, maintain or set aside one or more of the "Key National Landscape habits" as part of planning conditions? [Rejected, complicates the policy]

Policy NA1.5

[BNG policy now stand alone and justification set out in Appendix 5; links to priority habitats - species deleted]

A mitigation hierarchy should be applied to development proposals [Suggest adding ""located within the Malvern Hills Nature Recovery Plan area"" whereby adverse impacts on biodiversity are: (i) avoided; (ii) mitigated; and (iii) compensated for. Development proposals should provide a net gain in biodiversity of at least 20% [This goes beyond national policy but I welcome and support it.] particularly regarding the species and habitats listed in the Malvern Hills Nature Recovery Plan.

NA1.5: net gain is included as the final part of a policy point concerning the mitigation hierarchy. A call for net gain having its own dedicated policy point, ideally coming before the mitigation point.

NA1.5 states that "Development proposals should provide a net gain in biodiversity of at least 20% particularly regarding the species and habitats listed in the Malvern Hills Nature Recovery Plan." It is unclear what the "particularly..." proviso means, and what effect this has on the strength of the policy for species and habitats that are not listed in the Nature Recovery Plan.

Note the difficulty of including "species" in the policy wording. There is support for the policy clarifying that the 20% BNG requirement applies throughout the National Landscape, and that the gain should be focussed on all priority habitats found within the National Landscape boundary. Further explanation could be added in supporting text to clarify how this policy can benefit the "key habitats and species" identified in the Management Plan, and to encourage net gains for key species wherever this is feasible.

[BNG policy now stand alone and justification set out in Appendix 5; links to priority habitats - species deleted]

NA1.6 Target 5 should read 2030 – [corrected]

NA1.6 National target 1 is set at X hectares. [Added - the apportioned targets for the Malvern Hills National Landscape have been set out at a local level.]

[The dates are set out target by target by Defra.]

NA 1.6 Target 5 – why just farming? [Text set by Defra - a national target]

4.3: the definition of 'Biodiversity' would benefit from the addition of ecosystem services and could include reference to biodiversity being positively linked to crop yields. The benefits of implementing nature-friendly measures (reference given) could appeal to farmers. [noted - definitions are in the glossary]

[list of priority habitats and species updated]

4.5 Last sentence to read 'It "sets out and summarises" the species and habitats of the Malvern Hills and what should be....' [ACCEPTED and changed]

4.9: We would recommend a minor amendment to the first sentence, as follows: "New Local Nature Recovery Strategies (LNRs) have been developed or are currently under development". [AGREED and added.]

4.9 last line [National Nature Corrected]

4.9 add National Landscape after MHs." [added]

4.12 ADD HIMALAYAN BALSAM [policy amended to all for all invasive species]

Great to see deer and squirrel featuring strongly in this and the 3% of total land area as an increase in tree cover in keeping with PLTOF target 8.

Key issue- effect on silvicultural interventions/coppice woodlands and woodland type due to contractor availability and skills" (covered elsewhere in the document)

ADD water pollution by sewage releases – realise this occurs later, but saw dead fish in the Cradley brook the other day – say it twice! [Trying not to repeat/no need to say it twice!]

Add humans & dogs scaring wildlife [text added in recreation and farming]

ADD animal and plant diseases.....[ dealt with on p 73]

ADD labour shortage. [Added to farming and forestry]

4.15: there is no need for a capital letter on 'Payments'. [Agreed and changed]

4.17: It should be noted that wildlife moves not only northwards, but also upwards with increasing average temperatures. This may be important to consider in the context of the wide range of altitudes within the Malvern Hills National Landscape. [Text changed]

## Geodiversity

The section on Geodiversity is supported but could benefit from the inclusion of soils here or cross referenced to other sections. [Though there is a link between geology and geomorphology, soils have been left in farming and forestry because that is where conservation management lies]

NA4.2 The vernacular style is of buildings made of local Malvern granite edged with freestone: however we should note that as the quarries have been closed, there are now few sources to repair, let alone build new houses, in this vernacular style. Is there some way that a low-impact source could be provided to help maintain the character of the area? See also 7.97 [bullet amended]

4.18 Same text as 4.2 [4.18 deleted]

Policy NA2.1 states that “The geological and geomorphological features of the National Landscape should be conserved and enhanced through effective management”, listing four measures to deliver this. We would recommend amending the third measure as follows:

“Create new geodiversity resources through the retention of features exposed during road improvements, and site development, and any limited mineral extraction”. [Agreed and added]

Policy NA2.2: The wording of the first sentence of NA2.2 appears to be unfinished needs to be revisited. [amended]

NA2.2 Understanding of the geological value of the National Landscape should be promoted, its links with the historic environment and the need for its protection and management. This should be supported by continuing exploration and research into the geology and geomorphology of the area.

Suggest adding "and relevant authorities should develop policies and adopt decision making for development that seek to protect geological and geomorphological resources and features. [Agreed and added]

4.18 suggest the following opening sentence (which could ] alternatively also be used elsewhere in the plan): The National Landscape is shaped by awe-inspiring rocks, created and altered over astonishing time frames, yielding a landscape of great physical, ecological and historical diversity. This geological setting underpins the area’s natural beauty..... [4.18 deleted but added to 4.2]

p.21 Special features, 5th bullet. Gravels.....in the Ice Age flanking many of the steep slopes and underlying the commons... [Added]

9th bullet. ....western margin of a rift valley. The total movement on this fault is 2.5km. [noted but not added]

4.21. Key issues.(relates to 10th bullet in special features). Rockfalls are increasingly making the relict quarries inaccessible for safety reasons, so they benefit neither geologists nor the public. It is suggested that a long-term strategy is needed for managing this issue." [Text added]

Mineral extraction may provide the greatest opportunity to expose geological and geomorphological features. This is recognised in paragraph 4.23 of the draft Management Plan, which notes that sites including Whitman’s Hill Quarry “can be developed for geological exploration provided they are safe to visit”. We appreciate that mineral extraction may have been deliberately omitted from the policy to avoid the impression that large-scale mineral extraction is supported. However, we consider this impression could be avoided by the inclusion of text to explain the limited circumstances where extraction may be appropriate, as set out in paragraph 7.97 (“the limited winning of new materials should be considered where this helps to meet conservation objectives, does not impact on special features and is subject to all relevant consenting procedures.”). Suitable wording could be included as a footnote to the policy text. [new text in policy]

Pg21 access to geo-features needs to be appropriate and maintained or else no-one can enjoy/enjoy/study them. [Noted]

As well as climate-induced erosion, there is man-made erosion from paths etc. It seems that a lot of erosion is hastened through wheeled vehicles and to manage this it may be necessary to revisit the network of bridleways and access routes across the hills. [Recreational erosion discussed under recreation and access]

## 5 Climate

5.3 line one, report should be plural, there is more than one. Agreed and changed.

## Mitigation

No objections to this section, but we note there are several facts stated which would benefit from robust references. [Noted – will take time to track down the sources]

CL1.1 Recommended that point 2 “Reducing energy demand through transport and travel” is rephrased to perhaps make clearer how this can be achieved e.g. through active travel and public transport use. Although it is noted that there is more detail on this in Policy PE3.5. [Policy amended]

CL1.1 Greenhouse gas emissions should be minimised through a range of measures, including: Consider adding a couple more bullet points [both added]:

Recognising the whole lifecycle carbon footprint in policies and decision making associated with housing and other development

Recognising the greenhouse gas emissions associated with the destruction or removal of soil and vegetation for development.

Discouraging wood burning locally will help lower the carbon footprint of residents in Malvern Hills [Not added – [wood is a locally available, carbon neutral fuel which is not widely used, plus no known air quality issues in rural area, also a driver of some needed woodland management]

CL1.2 Climate change mitigation including [the sequestration of carbon] [ Suggest adding the role natural systems including soil and mature hedgerow and other vegetation plays in carbon sequestration ] should be a key component of land management practices and rural development support mechanisms in the National Landscape. [Agree and added]

CL1.2 This policy would benefit from some examples and methods how this could be achieved. [amended]

CL1.4 This policy that requires stakeholders to work towards the delivery of targets for climate change. It would be helpful if more information about the means and opportunities to achieve this could be provided. [Not the place, this is Defra’s target policy.]

CL1.4 Whilst tree planting is good in most circumstances, the healthy development of existing mature trees is even more significant, as tree mass is more significant for managing climate change than tree numbers. However, the current laissez faire pattern of tree spread over the Hills is positively deleterious. [ Defra sets the target – it is not for us to set it aside, have added footnote on our tree planting policy]

CL1.4 encourages more tree planting. However, this can result in shading of potential solar sites. The right to light and these competing initiatives should both be considerations during planning applications. [noted]

Malvern Hills has a good air quality. However, paragraph 5.14 notes, “The demand for wood fuel should bring more woodland into active management”. Officers caution that the availability of the fuel might encourage more wood burning within the Malvern Hills National Landscape, and thereby impact its air quality adversely. [See response under CL1.1]

Allow for connected landscape with mosaic as growing season for trees could shorten due to greater CO2 levels causing early onset autumnal senescence in trees or change length of growing season.

Manage woodlands in thinning to promote healthy stable stands to withstand more frequent and stronger storms.

More vigilant with biosecurity with land management

Despite the rurality of the National Landscape, the Management Plan should be open to the development of small-scale heat networks within the landscape in locations where clusters of rural off-gas properties are found. The development of heat networks is an important part of the government’s plan to decarbonise heat in the UK. In the appropriate circumstances, heat networks are highly efficient and cost-effective, and could offer a viable solution to clusters of rural off-gas properties which are found in the landscape. [Text adjusted]

## Adaptation

CL2 It is noted that a Climate Change Adaptation plan will be adopted by 2028 and this is welcomed. This will assist in the implementation of policies CL2.1 and CL2.2 which would benefit from some more detail as to how this could be achieved and the potential implications for viability of development. [noted]

CL2.3 Solar panels and alternative energy for heating should be encouraged to reduce fossil fuel demands and reduce the domestic and industrial carbon footprint. However, as well as the visual impact of the panels, which may limit their acceptability in Conservation areas, much of Malvern tends to lie east-west, leaving limited opportunities for buildings that do not present a clear south-facing wall or roof suitable for solar panels. [Noted]

5.4 first bullet should read Mitigation aims to reduce, “absorb” or prevent... [Added]

5.5 - The Management Plan refers to there being no increase in annual rainfall identifiable in the weather station data. Suggest further analysis to investigate whether there has been any change in the timing of rainfall or its intensity as will have implications for the outcomes of the Management Plan. [We have limited data, text tweaked]

Increases or changes in visitor pressure can cause a reduction in the vegetation cover of historic monuments and increase their vulnerability to erosion. This will result in harm to these designated heritage assets and shift their condition trend to declining. Managing visitor pressure is therefore a key element of climate change adaption, to safeguard a key component of the National Landscape and its designated heritage assets. [Noted]

5.9: References to 2006 CO2 emissions and carbon footprint data are out of date. [We can easily get LA-wide data but not cut to the NL boundary (awaiting PLTOF stats on this) Text deleted as agreed that references are too old]

5.11 is poorly worded and not coherent, with repetition of words and linking two sentences that seem to address different issues. [Agreed, rewritten]

5.12 Much popular focus has been on the issues arising from erosion, heavy rain and flooding. However, climate change also brings with it the possibility of drought and we are heavily reliant on the local fire

service to react to wildfires. We understand that the risk to housing is moderate; but the consequences of fire damage to ecologically-important open spaces would risk setting back some of the intended outcomes. [adjusted text]

5.13: This states that “It is the Government’s ambition to reduce the UK’s greenhouse gas emissions to net zero by 2050.” The word “ambition” here possibly underplays the fact that the government’s target is legally binding through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. We recommend a wording change to state that “The Government is legally committed...” or similar. [Changed to The Government has committed ...]

5.15 last line: duplication - delete ‘encourages the reuse ... existing buildings’ while keeping [Deleted]

Introduce more species with more southerly provenance to combat warming conditions. [noted]

Transport remains a challenge: despite the difficulties mentioned earlier, consideration should be given to greener forms of transport that will appeal to all ages. [Noted]

5.15 – footnote 22 - Likely to change to Para 158 in revised NPPF24 [not yet published, change when it is]

## Water

Outcome 5 – Water - The water flowing within [ suggest within and out of ] the National Landscape is clean and safe, helping to restore nature, improve people’s health and well-being, and contribute to the local economy; flooding is managed in harmony with nature. [Amended to flowing within and from]

CL3.2 Note the RIBA 2030 targets require higher standards than set out in the Local Plan and Building Regulations and whilst this might be an admirable objective it is questionable how effective such a policy can be. [No change, this is an aspirational target, considered to be appropriate for the MP]

CL3.4: part (v) of this policy refers to “Citizen science programmes to monitor water quality”, but citizen science is not mentioned anywhere else in the draft Management Plan. We question whether citizen science may also have a role to play in helping to deliver against other plan objectives. [added to volunteering section]

CL3.4 bullet iii – asks only ‘organic fertiliser’. [Not understand the point being made, amended to all fertilisers to be minimised]

5.16 line 1 ‘requires’ [changed]

5.17 Although there are no significant rivers within the AONB, there have been reported incidents of water pollution caused by heavy rain runoff across farm fields. Water – and pollution – flows downhill and the towns and villages at the receiving end – Old Colwall, Upton etc. will suffer if the Malvern area does not attenuate its water flow. To that end, SUDS (Sustainable Urban Drainage Systems) should be considered for new developments and as part of the planning process. [will deal with SUDS under Built Development]

5.17 Part of the National Landscape lies within ..... but there are three significant brooks - the Cradley, Leigh and Suckley. Suggest adding "and other brooks and streams may have functional connectivity with protected watercourses including the Severn Estuary" [Added]

5.18 Change second sentence to read - Spring water “pushes through” fissures and faults that characterise the very hard rocks of the Malvern Hills. And change Hayslad to Hayslad Spring. [changed]

5.21, 5th line. Not sure what ‘outflow to the sides’ means. Suggest: ....Malvernian granite rock, and outflow occurs mainly in the form of springs at or near the geological junction with the adjacent impervious Marls and Mudstones. [Changed]

5.24 last word – rivers not right – try waterbodies? [changed to watercourses]

5.29 line 3 replace ‘curses’ by ‘courses’ [changed]

Practical measure - Riparian planting to UKFS creating dappled shade and cooling of watercourses [A very good point -/ will consider.]

5.30 queries whether the water courses are important for water supply. [text adjusted]

5.32: more detail could be added about what natural flood management techniques are, including examples of the types of features. [text added]

## 6 People Health & Wellbeing

PE1.2 Change to - Children and young people resident within and around the National Landscape should be provided with environmental education opportunities to experience the area through direct contact with the natural environment “that will help to support” confidence building by overcoming challenges, “build” social skills through teamwork, “improve” mental well-being by reducing stress and anxiety, and “improve” mood. “It is also likely to reinforce” learning and “improve” memory retention by involving multiple senses, such as touch, sight, and hearing. [text altered].

Key Issues.

Noted Key Issues - Consider adding a point (6.15?) that acknowledges the challenges that some members of the community, particularly the elderly and disabled, may have in accessing the NL and thus the need to address safety and accessibility. You cover this earlier in PE1.1 but do not address it here in Issues as an aspect that needs to be considered. [New statement added]

ADD something about availability of loos as being a limiting factor in access to countryside. [see new issue statement]

ADD lack of engagement on issues from Schools and Health providers. ie not a co-ordinated response. It is mentioned as a wish, but is the key issue of lack of engagement needs to be explicit. [covered in 6.14]

Would have liked to see something about the role of the landscape of the Malvern Hills in educating our youth in understanding and appreciating our environment and how to conserve it. Also, about learning about teamwork and leadership in a challenging but relatively safe environment [Picked up in Health & Wellbeing Policy PE1.2]

## Volunteering

PE2.1 Support and encourage effective voluntary activity, in all its shapes and forms, that helps deliver the National Landscape Management Plan.

- Develop and support networks of volunteers able to assist in specialist activities.
- Encourage and support Parish Councils to achieve high standards in working closely with [ each other and ] voluntary and community groups and meeting local needs and aspirations within the National Landscape.

Change in last bullet [Accepted and done]

6.18-6.21 Volunteers can also bring in wider skills and experiences that would not normally be found in regular employees. These skilled volunteers, if recruited and used well, can “manage” and enrich the work of these amenity organisations. [agreed]

6.17. There are some very good examples of organised volunteering in the National Landscape..... Not sure if they want a mention, but Castlemorton Environment Group organise a rich programme of environmental talks, and Hanleys Environment Group coordinate the distribution of free trees for planting projects for their own and neighbouring parishes. [Text added]

6.17 end of second para: Trust not Conservators [Changed]

## Living & working

Outcome 8 - Living and working - Ensuring vibrant communities [“ within or partly within the National Landscape “] by stimulating diverse and sustainable economic prosperity that conserves and enhances the distinctive character of the National Landscape. [Rejected as not necessary – we want any community to conserve and enhance the NL, we do not need to assign a geography]

PE3.2 Support community initiatives that promote the creation and management of key habitats, appropriate renewable energy schemes, energy efficiency, recycling, community transport and community housing. – add – for which there is evidenced need [Added]

WCC’s Sustainability Team supports policy PE3.2. Schemes run by Worcestershire County Council, including the Home Upgrade Scheme 2, ECO4 Flex, Solar Together, Household Support Fund, and the Worcestershire on Demand bus service, can help to deliver against this policy. However, clear guidance is needed on what is acceptable within the landscape, and what would be approved through the planning system. [Noted]

PE3.4 – It would be helpful to refer to the constituent Local Planning Authorities requirements for affordable housing in relation to development. [Added]

PE3.4 Support the provision of a variety of housing that is appropriate to the character of the area and meets [ evidenced ] local community needs. The priority is to meet meeting affordable housing requirements, particularly housing that is affordable in perpetuity, such as social rented housing. In doing so, they [ Suggest instead ""development policies and development proposals should be compatible with..."" ] should be compatible with the National Landscape Partnership’s Position Statement 2 – Housing development in the Malvern Hills National Landscape and its setting. [No change since doing so may water down the aspirations set out in the Position Statement]

PE3.5 Reduce energy demand through transport and travel by: .... Reducing the need to travel by encouraging home working and affordable housing provision close to sources of employment, services and facilities; and.....

Suggest changing “affordable housing provision” to “ housing provision (especially affordable housing provision) “[Accepted and done]

6.27 – It would be helpful to explain here that NDPs are prepared in the context of the relevant Local Plan. [Text added]

6.28 Young adults have few educational opportunities in the area since the Malvern Hills College closed. Further education and vocational learning opportunities are some distance away, requiring them to commute long distances or move out of the area, “hollowing out” the demographic. We should hope to see the Management Plan consider opportunities for apprenticeships and skills, perhaps benefitting from some of the technology companies and craft skills required in the area." [Noted and a comment added]

6.30 First sentence doesn't quite make sense. Suggest: " There is a heavy reliance on car usage. The limited provision of public transport - and limited integration of this provision - restricts the scope for people without a car to explore the NL". [Added]

6.33 ..... There is a risk that too few affordable houses suited to local needs will be built in the National Landscape without proactive intervention....

Suggest adding "or that affordable homes are built in unsuitable or unsustainable locations in the area that are justified on meeting actual housing need arising elsewhere ". [added]

6.33 –Again, it would also be helpful to refer to the constituent Local Planning authorities requirements for affordable housing in relation to development. (This paragraph would more logically follow on from paragraph 6.31). [We already refer to the Local Plan so nothing added; reordered these paras]

We encourage the NL to develop far reaching strategies that embrace the link up between all forms of active travel that make it become the ‘go to mobility’ option for people visiting and living in the area. This strategy would need to consider how existing mobility infrastructure could be adapted and made attractive to users (i.e. safety away from moving vehicles; easy routes following least path of resistance principles such as avoiding direct steep gradients; quality signage with distances; removal from traffic zones, incentive schemes; linkages with transport hubs like stations and bus stops including partnership working to enable adaptations to existing public vehicles that allow mobility choices to be enabled such as allowing cycles on buses etc.), Five steps to improve our neighbourhoods, health and the economy - Sustrans.org.uk [Paragraph added]

Whilst there is no specific reference to the sufficiency of education and school places within the Management Plan, ensuring that that there is a good choice of education options and sufficient school

## Regenerative tourism

places available is key, if young families are to be attracted to living in the area. [there is now reference to school places in new 6.9]

Add Lack of agricultural skills. [Text added to new 6.30]

Add something about the Rally Blight [text adjusted to refer to motor sports more generally]

PE3.1 Stimulate and support regenerative tourism practices\* in the National Landscape that sustain its natural beauty, support nature recovery and enhance the well-being of local communities. This will include:

i. Ensuring that the tourism sector recognises .....

Assume this includes local authorities, other public organisations, private companies and other organisations, voluntary sector and also individuals (thinking AirBnB here). Also developers potentially who may be engaged to deliver holiday lodges, apartments, hotel upgrades etc etc.

If so, perhaps it is worth being explicit about this here? [Rejected - It does include them but best not to be explicit, if make a list then anyone excluded is left out; if keep to a general statement then everyone is included – no let out]

PE4.3 Work in partnership to develop the Malvern Hills as an area for show-casing new tourism technologies including:

Suggest adding a bullet "Technologies to aid accessibility and information for the elderly and people with disabilities" [agreed and added]

PE4.4 Explore opportunities to spread visitor pressure away from busy and sensitive areas to those that can sustainably accommodate benefit from this use.

Suggest adding "This should include a consideration of the impact of pet animals (dogs and horses in particular) and off road/off path vehicles and cycles (including mountain bikes) on sensitive habitats, soils and/or wildlife species." [added]

6.39 delete last sentence [deleted]

6.39 The current trails and tourist routes appear to be quite standalone. However these themed trails show great promise and we would hope they can be further developed. We note, however that they are currently dependent on car access. [noted]

6.41 change the Malvern Hills to the Malverns [changed]

6.42 There may be more opportunities to develop ecotourism, especially away from the most obvious Hill routes. [noted]

6.43 could also usefully refer to the ensuing sufficient provision of public toilets as this can be a key health issue which may impact on some people's ability to visit the National Landscape Area. [this has been added in other sections]

## Transport & accessibility

Policy PE5.2: We agree that sufficient infrastructure should be provided for charging of electric vehicles, scooters and bikes. It is important that this provision should include off-street charging for residents within the area. Particular consideration should be made when selecting sites for EV charge points to ensure they are suitably located to cater for residents in relation to being, as per the objectives of the draft Worcestershire Electric Vehicle Charging Infrastructure (EVCI) Strategy, (reference given). [Text added to second bullet]

PE5.2 The Hills act as an amphitheatre in picking up noise from traffic that competes with birdsong and the sounds of nature. It was notable how the area became so much quieter during Covid lockdowns, when vehicle traffic was suppressed. [Noted – an interesting observation]

However, over 20 mph most traffic noise is a result of tyres on the road surface. It is infeasible to regulate the types of tyres on cars. But it is possible to lay down quieter road surfaces. The Highways authority generally provides good quality roads in this area, but perhaps it could be encouraged to change the tarmac mix for a quieter road surfaces in key areas: Jubilee Drive, Wells Road and Hanley Road would seem to make the biggest impact. [Some text added as a new 3rd bullet]

Policy PE5.3 states "Ensure that new developments on the periphery of the National Landscape do not give rise to significant traffic increases and associated effects on tranquillity and enjoyment. Seek compensation for such effects where relevant".

This policy is further discussed in paragraph 6.60 but it does not really explain how this can be achieved or provide further information in relation to the compensation that should be sought and by whom, what levels and what this would be used for. It appears that if such a statement is to be included there needs to be more information about how it would work in practice and is likely to require viability testing etc. [This is a matter to be picked up in the action planning stage - the plan sets the aspiration]

6.47 check that still 16 vehicles for hire [now 15]

Paragraph 6.55: we recommend a minor amendment to one of the special features, as follows: "A comprehensive network of Public Rights of Way. [Done]

6.56 In addition, the proposed development of the Malvern Theatres complex will likely bring new pressures onto the centre of Great Malvern. We are told that this development will likely make Malvern the biggest theatre complex in Europe, and will offer lots of opportunities for learning and personal development. However, it is also likely to increase car demand and there is no money or space within the project for car parking or public transport within these plans – the theatre does not acknowledge parking as its problem.

This however could be an opportunity as a spur to invest more in public transport, or perhaps to collaborate with the Showground or other landowners for Park and Ride, or investigate more novel public transport options. [Point noted but no text added, theatre is in the town and outside NL, though we recognise potential knock-on effects]

6.65 refers to financial challenges faced by people with disabilities. We suggest that this paragraph would

## Recreation & access

benefit from rewording and input from groups representing people with disabilities. It might be helpful to refer to routes for 'wheels' which would encompass wheelchairs and children's pushchairs etc. although the point made in paragraph 6.74 is noted. [No text received as yet]

PE6.1 waymarking and consistent approach could lead to inappropriate signage on the open hills – something that MHT has resisted for a long time. [noted]

Several visitors are new to the countryside, for example visitors from Birmingham. There is a key issue in getting key information to these visitors about how the countryside works and what they can do to be responsible. Also missing is an easy way for such visitors to contribute toward the conservation of the landscape – visitor payback. [bullet added on visitor-giving schemes]

PE6.2 People from areas of high deprivation would benefit from scheduled public transport linking the main tourist hot-spots. Visitors are unlikely to be aware of the special local community schemes. This also means that visitors will tend to congregate around Great Malvern and the marked "Route to the Hills", rather than be distributed around the area. [noted]

We support the need for greater number of green and blue spaces within easy reach of people. We would encourage you to specify an aspiration for green in 15 (mins) that qualifies/quantifies what 'easy reach' means. [added to Policy6.2]

"Policy PE6.3 states that "Developments that are likely to lead to an increase in negative recreational effects in an area should contribute to the costs of mitigating and managing these effects".

Herefordshire Council is aware of this issue and is in discussion with Natural England regarding recreation mitigation in relation to the local plan. However, it seems that the management plan provides the opportunity to expand on this issue further and to set out how any negative recreation effects can be managed whilst at the same time wanting to encourage visitors to the National Landscape.

Recreation Pressure: Natural England would like to see greater reference to Recreation Pressure throughout the document that makes greater links with the potential impacts from different activities occurring in the area – e.g tourism; while addressing the need to harmonise and balance the interplay between access and protection of sensitive landscapes within the Malvern Hills. We strongly encourage the use of the precautionary principle in matters relating to the Malvern Hills SSSI, because the consequences of underestimating the impact of recreational pressure could be very significant.

(explanation and references given) [added visitor pressure as an issue and reference SSSI concerns] British farmers recognise, and continue to actively promote, the enormous benefits to people's wellbeing of getting out and enjoying the farmed countryside. Connecting people with rural areas can have a long-term legacy of greater appreciation, valuing and understanding of the countryside and where people's food comes from. But public access to the countryside must always be responsible, managed and safe, so livestock and the environment are protected. A thorough, updated and widely promoted code of behaviour is vital to allow the public to the countryside safely and responsibly. [added livestock worrying as an issue, code of behaviour covered elsewhere in document]

HE - We note that the 'Key Issues' section mentions the pressure on the Malvern Ridge from recreation, increasing footfall from the increasing number of visitors to the area and the increase in popularity of activities such as mountain biking (paras. 6.79 and 6.83). However, we consider that this could be strengthened to highlight the impacts on the historic environment and to detail how this pressure will be managed. [comment added to issues]

It is the case that the increasing activity is causing greater erosion on the Ridge leading to localised harm to heritage assets (along with impacts on the natural environment). We consider that the discussion of pressure on the Malvern Ridge should be strengthened in the background section, with the development of strategies to monitor and manage the pressure included as part of the policies and outcomes. These strategies may include options to spread or limit the current visitor numbers on the Ridge, particularly at peak times and that a new condition survey of the Shire Ditch, with fixed point photography, would assist with understanding change and impact. [text amended]

6.70 "Miles without stiles" would be appreciated by locals and visitors who are no longer as flexible or as agile as others. They are likely to appreciate the extension of this concept to South West Worcestershire. In addition, the Hills are seen as a place for large-scale group activities such as the Veterans' Help for Heroes Malvern Hills Challenge. [noted]

6.71 first sentence – what is green outdoors? Great outdoors? [changed]

Paragraphs 6.71 onwards discuss how minority groups might use National Landscapes and references studies dated 2005. It may be helpful to refer to more recent studies if they are available, particularly those that consider the impacts of covid and the now greater awareness and discussion of the impact of nature on mental health.

We question whether the management plan adequately addresses the issue of mitigation of recreational impacts sufficiently and balancing the requirement to encourage greater recreation use of the National Landscape. [noted – text altered]

6.74 ..... Their needs are important but other types of disability [ including hidden disabilities ] also need consideration. [text added]

6.78. "There is a very good rights of way network in the National Landscape that includes both public footpaths and bridleways. On the Malvern Hills, this network is underpinned by a system of open access for walkers and horse riders on land controlled by the Malvern Hills Trust. These arrangements can lead to confusion over access rights ". [noted and understood]

I personally find that some paths become impassable in wet weather if they have also been used by horse riders as the path surface becomes churned and the soil cohesion is damaged etc. If this is an acknowledged issue, perhaps some mention could be included as a consideration when applying Policy

**Information & Interpretation**

5.1 - i.e. consideration of making some sensitive paths inaccessible to horse riders. NB There's a really bad one coming off Chase End Hill down to White Leaved Oak into which your wellies sink up to the brim! [text altered]

Suggest adding a paragraph explaining the impact of additional dogs, off road cycles and horses on wildlife, grazing animals (an integral part of the management of the NL), soil erosion, and path accessibility?" [Was already in para 6.81]

6.79 While almost all bicyclists are perfectly well-behaved, there is plenty of evidence of badly-eroded unofficial tracks cut through woodland, and many walkers can speak of conflicts with a small number of mountain bikers who appear unaware or unconcerned of the damage they cause. [noted and understood]

6.83 Additional car parks near the paths that lead into the Hills are unlikely, now, to stimulate economic growth. There are a handful of cafes, but outside Great Malvern, there is very little retail or other local economy in the immediate vicinity of the paths. It is probably too late to think that new car parks will help to sustain new offerings elsewhere without serious effort and promotion that runs a strong risk of being out of scale. [noted]

6.84: there is significant duplication between this paragraph regarding signage, and paragraph 6.93. We recommend this is rationalised. [Agreed – both redrafted]

Add something about litter & flytipping [added]

ADD something about blood sports – fishing & shooting. [what is the issue?]

ADD something about the Rally. [addressed]

ADD Cold water swimming? [What is the issue?]

PE6.1 Visitors, residents and local communities should be provided with opportunities to increase their understanding and enjoyment of the special qualities of the National Landscape:

Suggest adding a bullet point "Information, interpretation, communications and marketing activities should consider how to reach people or communities with protected characteristics". [Bullet added]

6.88 line one – change Malvern Hills to Malverns. Delete new from new walking route. Last sentence not right. [suggest The accessibility and variety of the area’s landscape provides many educational opportunities for schools and young people to learn more about the special qualities of the area.] [Added]

6.90. Not all information is presented in formats accessible to all. There is a need to write in plain language, be concise and to take care in design. Communications may need to be specifically targeted at people with impairments. Some formats suit one type of impairment more than another: [ Comment - Also consider other languages (with a view to supporting people from the Indian and Pakistani and other community members mentioned in the previous section). Also potentially key European languages for overseas tourists/visitors. ]

- visual impairments – audio, audio description, Braille, Moon, telephone
- learning disabilities and literacy difficulties – audio, audio description, easy read, easy access, Makaton, subtitles
- hearing – British Sign Language, Makaton, subtitling, textphone, SMS [Comment - NB It is not frequently appreciated that the majority of the Deaf community (as opposed to the deaf community and those who are hard of hearing) may not be able to easily understand written English. Therefore, BSL or Makaton should be considered with greater priority for this community. ]
- co-ordination difficulties – large print, audio, audio description, telephone" [noted – most allowed for in 6.90. Not added any specific languages]

6.91 The Arts can be very useful in the interpretation of an area and the Hills have a long history of creativity inspired by nature – see references to the now closed Malvern College of Art above. The MH Conservators and Malvern Theatres could be encouraged to facilitate open-air creative arts and cultural activities in the Hills. (gives details of the activities of the Malvern Civic Society, Malvern Museum, and The Spa Association). Researches depend on access to archive material, and are key to developing new offerings to appeal to visitors. There is inadequate good quality storage locally which means that archives are currently distributed around private houses. [6.91 expanded]

Responsible management of public access in the countryside is key so it can be enjoyed by everyone, while recognising that much of it is an active working environment. The use of existing footpaths and raising public awareness of the access rights that already exist, should be practised rather than seeking new routes. A well-funded public messaging campaign to allow the public to visit the countryside safely, and in harmony with the farmed environment, would also be welcomed. [note added to key issues]

For the MHT estate there is good interpretation at the main visitor points, such as large car parks. However, there are many parts, such as Hollybush Roughts, where no interpretation exists – this can lead to unwanted behaviour (flytipping) and a poorer visitor experience (getting lost not knowing what’s going etc). [noted]

Malvern Civic Society is key partner in researching and delivering interpretation. However, it could be assisted in its co-ordination and repurposing its material for different forms of accessibility. [noted]

**7 Place Place**

Suggest an additional bullet point, between 2nd and 3rd: Rocky outcrops and relict quarries with unique microclimates and biodiversity [added to landscape special features]

The place – and its produce – influences the food offering of the area. Food is an important aspect of tourism, and perhaps more could more be made of this? (Malvern pudding, apples, pears, cherry, asparagus, hops, dairy, local breweries and vineyards.) [Noted – to be picked up in the action plan]

## Landscape

Outcome 13. Suggests that need to allow for change to landscape in this outcome. [I think it is implied as drafted; no alternative words offered].

PL1.1 Proposals that are likely to impact on, or create change in, the landscape of the National Landscape [ Suggest adding ""(which may include those outside of the NL but which may still affect it)"" ] should seek to further the conservation and enhancement of the natural beauty of the landscape with reference to key documents such as the Malvern Hills Landscape Strategy and Guidelines, local authority Landscape Character Assessments and Historic Landscape Characterisations and National Landscape Partnership guidance documents. [Rejected the policy as written picks up all proposals likely to affect the NL]

"PL1.1: material to this is the now active review and update of the Worcestershire LCA. Currently this is a strategic review of policies, drivers for change and the development of a methodology to integrate urban areas into the evidence base. It is, however, part of a larger programme that aims to revise some of the mapped areas (those affected by change) and the suite of guidance documents that support the evidence base. There is also an intention to explore issues and options for review of the HLC evidence base, although currently, no clear funding opportunities exist. It is more likely the timescale for this, should it be taken forward, will align more closely with the next Management Plan review. [noted]

Issues within the setting of the National Landscape remain a concern. It is understood that the Management Plan cannot control matters beyond the boundary, and that LPA policies should align with the Management Plan. However, it seems that securing conditions and enforcement to prevent inappropriate developments in the setting remains a challenge.

PL1.3 Conserving and enhancing landscape character should be a key objective of Environmental Land Management and rural development support mechanisms in the National Landscape.

Perhaps add "and its setting". [Rejected because why stop at the setting?]

Policy PL2.1 – Natural and Cultural capital requires responsible authorities to assess and evaluate the natural and cultural capital of the National Landscape. It also states the "use of natural and cultural capital accounting should inform investment, development and management decisions."

It would be helpful to have further clarification as to how this policy will be implemented and the expected role of local planning authorities. [Noted – MP not the place to provide this detail]

PL2.1 The natural and cultural capital\* of the National Landscape, and the services they provide, should continue to be assessed and evaluated by the responsible authorities:

- The use of natural and cultural capital accounting should inform investment, development and management decisions. [ Suggest adding ""including policy development"" ] ..... [just added policy]

PL2.2 Proposals affecting the National Landscape [ Suggest adding ""(which may include those outside of the NL but which may still affect it)"" ] should seek to conserve and enhance the natural and cultural capital of the National Landscape and the services they provide. [Rejected the policy as written picks up all proposals likely to affect the NL]

PL2.3 Natural and cultural capital and the services they provide should be key components of Environmental Land Management and rural development support mechanisms in the National Landscape. Suggest adding " and its setting". [Rejected because why stop at the setting?]

7.12 – delete as a repetition of 7.7 [deleted]

7.16 Whilst some apple orchards have been removed for various reasons, new orchards are being established. New orchards may not be planted on previous orchard sites due to the risk of disease. [note added]

7.18 reword as There has been an increase in the use of polythene to support the production of certain crops and "polytunnels are increasingly featuring as structures", especially..... [Text added]

7.18 & 7.20 The British soft fruit industry has been highly successful in producing a range of fruit over a longer growing period by taking advantage of advances in technology. It has been a particular success story for the Herefordshire and Worcestershire area, where growers contribute significantly to the local agricultural economy. They grow to meet the British consumers demand for soft fruit which would otherwise be met by foreign imports, considerably adding to CO2 emissions and thereby contributing to climate change. There is currently no alternative to using polytunnels if the area is to continue to have a thriving soft fruit sector. [note added]

7.20? Water resilience for agriculture is key as the climate changes. There are likely to be winter water storage opportunities for a wide range of sectors which can be sensitively designed to fit into the landscape and be utilised during the winter months to store and hold flood water. Our experience in previous summers show that the livestock sector was just as vulnerable as other sectors during drought conditions and therefore a wide range of resilience measures should be considered. We are concerned that the term "extreme care" may be interpreted in a negative way. Care is needed, but well-designed schemes can and should be integrated into the landscape. [Not aware of the term 'extreme care' being used – it is not in my draft]

7.19 last sentence. The sub-division of fields, "including with temporary" white tape can be visually intrusive. [Changed]

## Tranquillity & Dark Skies

Tranquillity and dark skies (page 60 onwards): we strongly support the inclusion of this section of the Management Plan, but recommend that greater emphasis is placed on the importance of reducing light levels at night for wildlife. [Already noted in 7.37]

Buglife have a Light Pollution campaign that could be worth referencing (<https://www.buglife.org.uk/campaigns/light-pollution/>). [New para in key issues]

Policy PL4 - Dark skies: Whilst the Malvern Hills National landscape is particularly dark, from recent data it appears there has been a contraction over the past 2-3 years in a dark corridor between Great Malvern and Ledbury. We are concerned by increasing pollution from artificial light. The proposed dark skies policy is important for wildlife, as it will help to protect important dark corridors for light-sensitive bat species, such as greater horseshoe and lesser horseshoe bats (and other wildlife), for which the national landscape is important within both a Worcestershire and regional context. [Noted and agreed]

Policy PL4.2: this policy would also benefit from including reference to the Institution of Lighting Professionals/Bat Conservation Trust Guidance Note 'Bats and Artificial Lighting at Night' (<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>). [Added Bat Conservation Trust to the policy, links already in 7.37]

PL4.2 Proposals that are likely to impact on the dark skies and tranquillity of the National Landscape [ Suggest adding "(which may include those outside of the NL but which may still affect it)" ] should have regard to and be compatible with best practice standards and guidance, in particular, the National Landscape Guidance on Lighting as well as that published by the Institution of Lighting Professionals and the Commission for Dark Skies. Lighting schemes should be kept to a minimum and only installed where it is imperative. [No need - the policy as written picks up all proposals likely to affect the NL]

7.35 – footnote 44 – likely to be same paragraph in the new NPPF [note – will be checked on publication]

7.37: The good design principles referred to in this paragraph extend beyond the highway extents and should also be applied in commercial, industrial and residential settings within the National Landscape. Sodium street-lighting remains a major obstacle to dark skies, although we note that many parishes are now favouring directional LED lighting alongside gas lamps. However, modern vehicles with bright and badly-adjusted LED headlamps would seem to be undermining some of these efforts: and dazzling is made worse by the undulating road network Traffic enforcement could be used to encourage better maintenance and adjustment. [Added text under key issues]

Key issues - Suggest having a paragraph noting about the setting of the NL? i.e. the setting of the NL is integral to the enjoyment of the NL's special qualities. Proposals in the setting that could introduce noise or light pollution that affects the perception of tranquillity for people experiencing the NL (in views to or from the area as well as whilst in the area) should be avoided or steps taken to mitigate adverse impacts." [Believe para 7.35 already deals with setting]

## Historic environment

PL5.1 Proposals that are likely to impact on the historic environment and cultural heritage of the National Landscape [ Suggest adding "(which may include those outside of the NL but which may still affect it or specific historic or cultural features within it)" ] should be compatible with, and seek to further, the conservation and enhancement of these heritage assets and their setting. [Used the HE words instead]

Policy PL5.1 – We suggest that the wording of this policy is amended to align with the wording of the NPPF more closely. The key aspects of the NPPF are that proposals should be informed by an understanding of significance, seek to minimise harm, and seek to sustain and enhance significance. [added a bullet point]

Policy PL5.2 – We suggest that the wording is amended to something along the lines of "Promote opportunities to increase awareness and understanding of the historic environment through the use of existing resources such as Historic Environment Records, .....and Heritage Assessments. These should be used to guide decision making in the management of the National Landscape's historic environment". [amendments made]

PL5.4: consider adding "conservation" in because this is an activity that should become more enshrined in community participation and engagement, and it can complement the actions to address Key Issue 3, given that there is a strong relationship between the natural and historic environments. [added]

Policy PL5.5 – We suggest that the target is widened to encompass non-designated heritage assets and also to address trends (please see our comments above in relation to Para. 2.8). [cannot do that in this policy as it is a target set by Defra]

7.38 et seq. Relict quarries and associated earthworks and artefacts are not mentioned (except for limekilns) in this section. They are a significant part of the MHNL's industrial heritage. [bullet added to special features]

We note the reference to recreational pressure causing erosion on the ridge of the Malvern Hills. We welcome this reference, but consider that the Management Plan should go further and identify, alongside partner organisations, strategies to improve understanding and management to reduce these pressures. [noted]

7.39 Historic England have told us that that the Malvern area is poorly surveyed and protected by listing on the National Heritage List for England. [Noted but a matter for planning authorities, need for more data is in extant text]

7.42 Historic assets include churches and burial grounds, key areas of open space with strong cultural and historic affinities. When properly managed, they also offer opportunities for nature. [noted]

Schools have also been an important feature of the built environment, taking over after the popularity of the Water Cure. The private schools are now under threat by government taxation. [noted]

There are other heritage buildings where there are no current prospects for repair or reinstatement: examples include the "Worm" at Great Malvern railway station; the former Emmanuel Evangelical Church where the steeple was taken down; and the almost total loss of the five American hospital sites that were

## Farming & forestry

established in WWII, and subsequently operated as resettlement camps, civilian hospitals and industrial sites. [noted]

7.44: It may be worth reviewing the NE SHINE dataset for the National Landscape. While this remains fundamentally a tailored product drawn from HERs, it does support CS opportunities and an understanding of constraints under SFI. Land management schemes are evolving, but continue to offer opportunities to deliver conservation-led management of historic environment features and their setting. [Thank you for the suggestion, useful for background research/actions]

7.45. It is important to recognise that land and property owners may be aware of the historic environment but there may be limited support available to assist with the costs of managing it. [text added]

7.48: The 2006 survey and scrub/erosion management plan is long overdue for review. [noted]

7.48 – It is important to recognise that farming practices can often help maintain and management heritage assets, for example registered parkland is often grazed by stock and old barns can be conserved as part of the farm. Any damage cause would depend entirely on the methods of cultivation, drainage and diversification. It is a far too broader statement to suggest that change from permanent grassland to seasonal cropping increases the chance of damage, due to cultivation or that farm diversification can intensify these effects. Diversification, changes in cultivation and drainage may help preserve the historic environment. Similarly to section 7.45, there may be limited support available to assist with the costs of managing. [Text added and amendments made]

We should also remember that the historic environment includes intangible assets; local knowledge and stories, festivals and events, crafts and arts. [agreed and already alluded to under key features]

Be aware of the “commercial” pressures that appear to be behind the closure of public houses and churches and chapels. Some public buildings can also “disappear” – such as is happening with the Great Malvern Town Council offices. These closures can occur relatively suddenly, and leave a void in the street scheme, as well as a gap in the traditional provision of these facilities. While these buildings can be registered as “Assets of Community Value”, it is often not feasible for the community to raise the funds or find a new purpose for the building. [This is an important point but not clear how the management plan can address it]

Add something about high proportion of listed buildings and being prevented from using low carbon technologies. [text added]

Outcome 16 (Farming and forestry): this section would benefit from expansion to include (regenerative) farming and food production, as these are not specifically mentioned and have a significant role to play in the National Landscape. [Agreed and new paragraphs added to the background section]

Policy PL6.2: Enhancing existing woodlands and orchards will be of significant benefit to pollinators, and will help to achieve the objectives outlined in Worcestershire’s Pollinator Strategy. These are all positive and achievable priorities for farming and in keeping with Worcestershire. Consideration should be given to an addition to the policy to include nature-friendly farming techniques such as ‘appropriate arable field margin management’, enhancement of hedgerows, etc. The reference to “Plantations on ancient woodland sites” as an identified priority aligns well with the upcoming LNRS guidance, and would be highly beneficial to biodiversity. [text added to the policy]

PL6.3 [ suggest adding ""within the NL and its setting"" ] Woodland creation and tree planting proposals (including natural regeneration) should seek to further the conservation and enhancement of the natural beauty of the National Landscape. They should: .....” [Not sure necessary, the policy as a whole brings in the concept of setting and views]

Key Issues: Farmland (page 70 onwards): this section would benefit from more description and emphasis on the role of regenerative farming, which enables food production, biodiversity enhancement, soil protection and health and natural flood management opportunities. It could be stated that it is not a binary choice between food production and nature, and that both can work together. It may also be worth making the point about food waste, where the plan talks about the demand for more food production and food security. Whilst it is not necessarily the place of the plan to comment on issues in wider society, it does do that in other areas of the plan, so may be worth including this point. [text added in the background section]

7.50 – The sentence of ‘strong profit motive’ should not be seen or interpreted negatively. Profitable farming businesses are able to invest more in practices and technologies, very often leading to environmentally sustainable practises and enhancing the natural environment. [noted – deleted ‘with strong profit motive’ as not adding to the point made in the paragraph.]

7.53 line 3 replace ‘faming’ by ‘farming’ [changed]

7.53 & 7.55- not really called England Woodland Grant schemes but Woodland Grants and Incentives- for woodland creation FC have the Woodland Creation Planning Grant (WCPG) and England Woodland Creation Offer (EWCO). [changed]

7.70 first sentence: the sugar tax is not a health issue, but a response to a health issue " [agreed – changed]

7.70 last sentence management in “many” traditional [changed]

7.77 second sentence, full stop after growth" [added]

We welcome mention of the potential for the farming community to diversify their land use interests as a business Opportunity. This presents the opportunity for more local destination sites away from the hills to provide alternative recreational uses such as mountain biking venues; lower altitude walking route affording different views and experiences of the hills; linked active travel routes for cyclists that are well signed and utilising routes away from busy roads. These features offered in combination have the potential to provide a different experience for visitors that may draw them away from the Hill tops. [noted and agreed]

## Built development & local distinctiveness

We understand that commoners' grazing is less popular now because of vehicle collisions and other livestock incidents. This may need a review of fencing and driver education/notices. [interesting observation,]

Outcome 17 – Built development After “National Landscape” suggest adding “and its setting” - and after “development” suggest adding “in the NL and its setting [ not changed, setting issue is addressed in PL7.1] PL7.1 ..... bullet v change to Malvern Hills Partnership position statement including those on housing and landscape-led development

Bullets x delete “and” if also delete bullet xi. Bullet xi not needed with the rephrasing of v. [amended]

Policy PL7: We recommend a minor addition to policy PL7.2, as shown below, to ensure that Minerals and Waste Local Plans are recognised as part of the planning policy context:

“The purposes of conserving and enhancing the natural beauty of the National Landscape and increasing the understanding and enjoyment of the area’s special qualities should be identified as strategic priorities in Local Plans (including Minerals and Waste Local Plans), Neighbourhood Plans, Local Transport Plans and other relevant plans and strategies. These plans and strategies should explicitly identify the Malvern Hills National Landscape (AONB) Management Plan as a material consideration and recognise National Landscape guidance documents and position statements as appropriate.” [amended]

PL7.3 .. bullet i .. suggest replace “its” with “other Malvern Hills National Landscape Partnership” for clarity/grammar [adjusted]

PL8.1 Proposals [ suggest adding “(which may include those outside of the NL but which may still affect it)” ] that are likely to impact on the local distinctiveness of the National Landscape should be compatible with, and seek to further, the conservation and enhancement of this local distinctiveness.....[rejected, not necessary]

PL8.1 – second bullet – end with “ and as part of Neighbourhood Development Plans.” [added]

Historic England considers that this section should make reference to the historic environment in its policies and background. For example, we suggest that the second bullet of PL8.1 could have the word ‘historic’ inserted between ‘local’ and ‘settlement’ to capture this and that the sentence beginning ‘Innovative designs, [used and historic so as not to limit the scope of the policy]

....’ could also reference compatibility with the conservation of the historic environment, as well as being informed by an understanding of the historic environment. [added]

PL8.2 development “and use” of design guidance [amended]

PL8.2 - This policy is not phrased quite right? Who is encouraged? I assume LPAs and parish councils (with NPs) [amended]

Policy PL8.3: We agree with the need to make best use of finite resources and support the approach to the extraction of Malvern stone. However, we are concerned that the policy requires the same robust test of need to be applied towards recycling and re-use of locally distinctive building materials as it does to their extraction. The impacts arising from extraction are likely to be of a different order of magnitude to the impacts arising from recycling and re-use. We consider there is no need to impose such strict policy restrictions on the appropriate recycling and re-use of materials; indeed, strong encouragement of these measures will help to reduce the need for extraction in the first place. [replaced ‘robust evidence of’ with ‘a’]

Historic England - In addition to the statements on the built environment, the plan should acknowledge that new farm buildings and infrastructure will be required in the future to enable businesses to grow and remain sustainable. New infrastructure may also be required to facilitate the management of manure etc and this can bring many environmental benefits. [Believed to be covered as part of general development wording]

The plan should acknowledge that new farm buildings and infrastructure will be required in the future to enable businesses to grow and remain sustainable. The cost of planning permission within the National Landscape, due to the number of surveys required, can be expensive and sometimes time sensitive, which may prohibit growth. For smaller business, trying to achieve relatively small changes or diversification, the cost can outweigh the benefit of projects and therefore reducing the resilience in the rural communities, this should not be the case.

7.83 “Several parish councils in the National Landscape have either prepared or are preparing Neighbourhood Development Plans” - suggest adding "or partly within" and adding "and its setting" [just added and its setting – otherwise tautology]

7.85: This states, in the context of national planning policy, that “The policy direction is to refuse planning permission for major developments in National Landscapes unless there is a prime public interest .” The actual wording in the NPPF, at paragraph 183, is that “permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.” The NPPF therefore requires both exceptional circumstances and public interest tests to be satisfied, and this should be accurately reflected in the Management Plan. In addition, we recommend deleting the word “prime” from the proposed Management Plan, as it is unclear what this means, and the NPPF refers simply to the “national interest”. [replaced with quote from NPPF] 7.85, where “policy continues to give great weight to conserving landscape and scenic beauty in National Landscapes. The conservation of wildlife and cultural heritage are also important factors. The policy direction is to refuse planning permission for major developments in National Landscapes unless there is a prime public interest” and 7.91 “the cumulative impact of numbers of small developments”.

People live in and move to Malvern for its historic and natural landscape, and so any developments need to subtly blend in to this mixture. [agreed and noted]

7.86 “There should not have to be a binary choice between conserving and enhancing the natural beauty of the Malvern Hills National Landscape, and planning for and permitting new development”. Suggest adding “in the NL and its setting” [added]

7.88 .....” The approach to major developments that could affect the National Landscape and its setting needs to be consistent.”... Why just major developments? Small concern that they are mentioned here, and then there's a bit of a leap to discuss permitted development rights in 7.91. The impact, especially cumulative impact, of smaller developments of 1-5 homes shouldn't be underestimated. [agreed and amended]

7.89 “The allocation of land for new development within and adjacent to the National Landscape has not always been preceded” ..... Use “in setting of” rather than “adjacent to” [changed]

7.90: This refers to Government proposals to restore mandatory housing targets, which have since been published in the new NPPF. As such, this paragraph will need to be updated. [Agreed but the 2024 framework is still only a consultation draft]

7.90 ..... The management plan supports this approach. However, all new housing should be sensitively located and designed. .... Suggest adding after however, ‘and, if in settlements that are in or partly in the NL, should be justified on the basis of local need arising within the NL (as clarified further in the NL's housing position statement)’ [BUT – Gov is consulting on a new NPPF that will change the approach to housing provision – we need to see what the new position is before tweaking this paragraph.]

7.91 .... “developments. Every change of appearance or use of property in the National Landscape has the potential to have either a positive or negative effect. For example”:  
Better to say “Every new property or change”... [Do not agree, the revised wording does not cover the same subject].

Suggest adding a bullet point with an example of an impact of a small development of 1-5 properties. e.g. their impact on local surface water drainage, local village or landscape character (density/ design/ lighting / tranquillity etc) [will consider]

7.91: There is a typo in the final sentence of paragraph 7.91, which refers to Article 4 “Directives”, but should be Article 4 “Directions”. [corrected]

7.92 ... should it be urban and rural? [do not understand the question]

7.93 - Renewables

Farmers have the potential to deliver many forms of clean energy and farmers within the Malvern Hills area are ideally placed to benefit from these technologies. Renewables like solar, wind power and bioenergy contribute nearly half of UK electricity production today, and farming is uniquely placed to be part of the solution to tackling climate change, as a sustainable source of food, fibre and energy. [sentence added]

7.95 The planning framework is complex, and the layers of different local government requires a particular level of skill to navigate around the different policies in place. Any way of standardising and simplifying the volume of planning policies and design documents that need to be understood would likely be welcomed by developers and homeowners. [Noted!]

7.97: We note that the text in paragraph 9.97 on minerals extraction remains unchanged from the adopted 2019-2024 Management Plan. We are supportive of this text, apart from the final sentence; as drafted, the wording suggests that there are no currently adopted Minerals Local Plans covering the AONB. While some plans are older than others - and the five-yearly plan-review period effectively creates an almost-continuous cycle of MLP development - all parts of the AONB are currently covered by extant Minerals Local Plan policies. We would suggest that this should simply say “Control is through the Minerals Local Plans that cover the national landscape area.” or similar. [agreed and amended]

Heading “Setting” - is this at the right level of heading/subheading? Seems to be under Local Distinctiveness but separate from Issues? [adjusted format]

7.94 – “in the setting of” is better than “adjacent”. [agreed and changed]

Heading “Local distinctiveness” - is this at the right level of heading/subheading? Seems to be under Local Distinctiveness but separate from Issues? [adjusted format]

Heading “Agricultural buildings and infrastructure” - is this at the right level of heading/subheading? Seems to be under Local Distinctiveness but separate from Issues? [adjusted format]

7.80 footnote 52 and 7.92 footnote 57 will need updated when NPPF 24 released" [agreed]

## 8 Appendices

### Appendices

Appendix 3: Stakeholder delivery – priority actions

We note that “Consultees are encouraged to record here the actions they anticipate delivering in 2025/26.” In this regard, WCC would like to record the following actions (although these may not all be delivered in a single year). WCC will:

- Have regard to the Management Plan and its policies, including in relevant planning decision-making.
- Have regard to the guidance published by the National Landscape.
- Include specific reference to the special qualities of the National Landscape, and to the Management Plan, in relevant planning policy.
- Ensure that the Worcestershire Local Nature Recovery Strategy takes account of the guiding principles and priorities for action of the Malvern Hills Nature Recovery Plan.

Appendix 5

In relation to the ‘duty of regard’, footnote 79 refers the reader to an appendix of the Cotswolds AONB Management Plan 2025-2030. It may be more appropriate for the Malvern Hills Management Plan to include this information in an appendix of its own, where the reader can access it without having to open another document. This would also reduce the risk that the Cotswolds Management Plan may be revised at

an earlier date than the Malvern Hills Management Plan." [Agreed – deleted reference, we are waiting for advice from Defra]

"Appendix 5

A doubling of the legal national BNG requirement could make many agricultural developments unviable, the viability would be specific to that area and can't be assumed based on a study focusing on commercial developments in Kent. The governments updated planning practice guidance on BNG states that - 'Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented'.

The NFU is keen to assist the council with the development of this policy so if you require further information or clarification of any of the points raised in this response, please do not hesitate to contact me at the Midlands Regional Office (02476 939 402) or via email."

We look forward to seeing how the 'seek to further' duty can be implemented through the planning process and planning appeals. [noted and appreciated]

Appendix 5 Footnote formatting gone wrong and NPPF will need updating [agreed and belief is that 20% BNG evidence requirement is covered – at least to an extent – by Appendix 5].]

## Glossary

Items for the glossary, p.93 et seq

Community Strategy: This definition is out of date. The duty to prepare a community strategy was repealed under Section 100 of the Deregulation Act 2015. In addition, the term is not actually used in the Management Plan, apart from a single reference in footnote 19 (and we query the validity of this reference in our comments above on paragraph 5.9). [DELETED]

Geodiversity. The term geodiversity includes the natural range and diversity of rocks, minerals and fossils, and landforms, the processes that have formed them through time, and soils and hydrological features. [AGREED & ADDED]

Geodiversity: suggest include an explanation of the term geomorphology (used in Outcome 2) [ADDED]

Local Development Frameworks (LDFs): Note that the term "Local Development Framework" and references to the regional spatial strategy are now outdated. Furthermore, it does not appear that the term is used anywhere in the Management Plan, so it is unclear why a definition would be needed. This definition should be replaced with the NPPF's glossary definition of "Local Plan". [LDF DELETED, LP ADDED]

Local Geological Sites (LGS) Previously known as Regionally Important Geological and Geomorphological Sites (RIGS). Sites are selected by recognised geo-conservation groups, according to nationally agreed criteria. [CHANGED]

Local Strategic Partnerships (LSPs): We question whether this definition is required. The term is not used in the Management Plan, and the status of LSPs covering the national landscape area is unclear. [DELETED]

National Cycle Network (NCN): there is a typo in the definition, which refers to "rout" rather than "route". [CORRECTED]

Public/Transparent: we question the need for these entries in the glossary. Both are widely understood words and neither has a particularly specific meaning in National Landscape terms. [DELETED]

Regional Forestry Framework (RFF): we are unable to find any reference to this document beyond the 2010-2013 period. It is unclear whether it remains extant. [TRYING TO FIND OUT]

Renewable energy: the definition does not include biomass. A wider definition (such as that provided in the NPPF for "Renewable and low carbon energy") may be more appropriate. [AGREED AND NEW TEXT]

Sustain: whilst this definition conveys a positive message, it does not give a 'natural' meaning of the word, and may not be suitable for the glossary. This is especially apparent when followed by the glossary's conventional definition of "sustainability". [DELETED]

ALSO ADDED

Climate change adaptation

Climate change mitigation

Major development

Rural exemption sites

Stepping stones