



Malvern Hills
National
Landscape

**MALVERN HILLS NATIONAL LANDSCAPE TEAM REPRESENTATION TO THE
FOREST OF DEAN DISTRICT REVISED DRAFT LOCAL PLAN 2025 – 2045**

Regulation 18 Consultation

March 2026

1. Omission of landscape character and National Landscape policies	2
2. Policy RLP.5 Strategic Sites	7
3. Policy RLP.60 Glynchbrook Garden Village (Redmarley Parish)	10
4. Policy RLP.4 A Quality Living and Working Countryside	16
5. Policy RLP.10 Affordable housing on Rural Exception Sites	16
6. Policies RLP.71–73 Bromsberrow Heath Allocations	16
Appendix A. Landscape Evidence Base Review	i
Appendix B. Landscape Evidence Base Review Plans	ii

1. Omission of landscape character and National Landscape policies

Introduction

- 1.1 The Malvern Hills National Landscape Team is concerned by the omission from the Revised Draft Local Plan of both a district-wide landscape character policy and a dedicated policy for the Wye Valley and Malvern Hills National Landscapes. Those omissions are significant in a district with a strong landscape identity, extensive environmental constraints and two nationally designated landscapes. The plan should contain a clear policy framework for conserving and enhancing landscape character, natural beauty and the settings of the designated areas.
- 1.2 At present the plan contains policies on matters such as biodiversity, green and blue infrastructure, design, locally distinctive areas and locally valued landscapes, but it does not include a policy that addresses landscape character across the district or a specific policy for development affecting the National Landscapes. That leaves an obvious gap in the plan's policy framework and risks weakening the basis for both plan-making and development management.

Policy and legislative context

- 1.3 National Landscapes have the highest status of protection in relation to landscape and scenic beauty. Paragraph 189 of the NPPF requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Landscapes and makes clear that development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated area.
- 1.4 Paragraph 11 of the NPPF is also relevant in plan-making, recognising that policies protecting areas or assets of particular importance to the natural environment may provide a strong reason for restricting the scale, type or distribution of development. Protected landscapes fall within that category.
- 1.5 For landscape more broadly, paragraph 187 of the NPPF requires planning policies and decisions to protect and enhance valued landscapes and to recognise the intrinsic character and beauty of the countryside, while paragraph 188 expects plans to take a strategic approach to maintaining and enhancing natural capital and landscape-scale networks.
- 1.6 Section 85 of the Countryside and Rights of Way Act (CroW) 2000, as amended, requires relevant authorities to seek to further the purpose of conserving and enhancing the natural beauty of National Landscapes when exercising functions which may affect them.
- 1.7 The Management Plans for the Wye Valley and Malvern Hills National Landscapes are also material considerations. A sound local plan should provide a policy framework capable of giving effect to that statutory and policy context in a clear and consistent way.

Need for a district-wide landscape character policy

- 1.8 While Policy RLP.132 states locally valued landscapes should be considered alongside other designations such as National Landscapes, the plan does not contain a policy that requires development to respond to the distinct character, pattern, scale, settlement form and scenic qualities of the district as a whole.

- 1.9 This is particularly important in the Forest of Dean, where the district contains markedly different landscape types and a strong sense of place: the Wye Valley, the Severn Vale, the Forest core, wooded scarp and ridge landscapes, and the northern farmland and sandstone landscapes associated with the southern Malverns.
- 1.10 The plan itself recognises the district's distinctive landscapes and special qualities. However, the requirements of paragraphs 187, 188 and 189 of the NPPF have not been translated into locally specific development plan policy. The draft plan is missing a policy that assesses proposals against the character, distinctiveness and sensitivities of the Forest of Dean landscape.
- 1.11 Without a landscape character policy, there is a risk that the plan becomes overly reliant on site-specific mitigation, masterplanning and green infrastructure to address harm after strategic choices have already been made. A proper landscape character policy should instead help shape those strategic choices from the outset, including the distribution, form and scale of development and the way settlement edges are treated.
- 1.12 Such a policy should require proposals to conserve and, where possible, enhance landscape character; take account of relevant landscape character assessment and historic landscape characterisation; respond to settlement pattern, landform, vegetation structure, key views and skylines; avoid suburbanising or urbanising influences in sensitive rural landscapes; and secure mitigation and enhancement that are genuinely landscape-led rather than decorative add-ons.

Need for a dedicated National Landscapes policy

- 1.13 A dedicated National Landscapes policy is also necessary. Given the national importance of this designation, and the fact that there are two within the district, the absence of a specific policy is disappointing.
- 1.14 National Landscapes are outstanding, iconic landscapes whose distinctive character and natural beauty are so precious that they are safeguarded in the national interest. They are of immense value to the nation, offering a wide range of public goods and services. This context has helped support the delivery of appropriate new housing in National Landscapes, including affordable housing based on local needs, making an important and positive contribution to support vibrant and thriving rural communities, which is compatible with, and does not compromise, the character and natural beauty of the National Landscape.
- 1.15 The plan should not leave National Landscape considerations to be inferred from general references to natural beauty or environmental protection, especially given the duty relevant authorities have to further the purpose of conserving and enhancing the natural beauty of National Landscapes.
- 1.16 A dedicated policy should apply to development within the National Landscapes and to development outside them which may affect their setting. It should make clear that great weight will be given to conserving and enhancing the natural beauty, special qualities and landscape features of the National Landscapes, and that proposals must demonstrate how they have responded to the National Landscapes' Management Plan, guidance, position statements and other documents.

- 1.17 It is important that any policy wording considers not only development inside the designated areas, but also development in the wider settings. Effects from the setting can often be where pressure lies: changes to settlement form, built influence, lighting, traffic, noise infrastructure and recreational pressure can all materially affect the National Landscapes even where development is physically outside the designated boundary.
- 1.18 The policy should also provide a clear basis for considering cumulative effects. That is especially smaller sites, and incremental changes may together erode rural landscape characters and the special qualities of the National Landscapes.

Why this matters in the Forest of Dean context

- 1.19 The Forest of Dean is a highly constrained district with extensive valued countryside, nationally important habitats, strong landscape identity and a settlement pattern that is often sensitive to expansion. The Revised Draft Local Plan itself acknowledges the district's special landscapes, the presence of two National Landscapes, and the need to conserve the district's special qualities. It also identifies an objective of conserving and enhancing the district's distinctive qualities based on landscape, heritage, townscape and biodiversity.
- 1.20 Policies related to landscape character and the National Landscape would most directly and clearly carry that objective through into decision-making. The plan does not yet provide a sufficiently clear policy framework for assessing whether allocations, growth strategies or windfall proposals conserve and enhance landscape character and the natural beauty of the National Landscapes and their settings.
- 1.21 For a plan to be considered sound it should be justified by proportionate evidence, effective in operation, and consistent with national policy. Where a district contains two National Landscapes and substantial landscape sensitivity, it is hard to see how a local plan can be fully effective or fully consistent with national policy without express policies dealing with landscape character and National Landscapes.

Recommendation

- 1.22 The most robust way forward would be to add two distinct policies to the plan: one on Landscape Character and one on National Landscapes. These would sit within the environmental policy section and cross-refer to the design, GI, biodiversity and historic character policies, and also any allocations that are within or may affect the National Landscapes.
- 1.23 Both policies should be supported by reasoned justification that refers to national policy, the Section 85 duty and the status of the relevant Management Plans as material considerations.
- 1.24 This would be in keeping with good practice elsewhere. Other local plans in similarly sensitive areas and in adjacent authorities use separate policies for landscape character and for protected landscapes. It gives clarity to applicants, decision-makers and examining Inspectors, and it reduces the risk of important landscape issues being dealt with in a fragmented or inconsistent way.

Indicative policy wording: Landscape Character

- A. *Development proposals should conserve and, where possible, enhance the landscape character, scenic quality and local distinctiveness of the Forest of Dean district*
- B. *Development proposals should be informed by relevant landscape character assessment, historic landscape characterisation and settlement character evidence, and should demonstrate how they respond to landform, vegetation pattern, field pattern, watercourses, settlement form, built edge, key views, skylines and the relationship between settlements and the wider countryside.*
- C. *Landscape and Visual Impact Assessment (LVIA) will be required for all major development proposals and for other proposals where they are likely to have a detrimental impact upon:
 - i. *The landscape as a resource in its own right; and / or*
 - ii. *Views and visual amenity.**
- D. *Development that would result in the erosion of important landscape characteristics, the suburbanisation of rural landscapes, the loss of characteristic features or the weakening of settlement identity should not be supported.*
- E. *Where development is acceptable in principle, mitigation and enhancement should be landscape-led and should reinforce character rather than simply screen development from view.*

Indicative policy wording: National Landscapes

- A. *Development proposals within the National Landscapes and their settings¹ will be required to demonstrate that they conserve and enhance the natural beauty of the National Landscapes, including their special qualities, landscape and scenic quality, natural heritage, cultural heritage, and relative tranquillity.*
- B. *Major development within the National Landscapes will not be supported.²*
- C. *Development proposals in the National Landscapes and their settings will be required to avoid, mitigate and, as a last resort, compensate for any residual adverse effects on the natural beauty of these areas.*
- D. *Development proposals in the National Landscapes and their settings will need to demonstrate that they have been sensitively sited and designed to avoid or minimise adverse impacts, considering cumulative effects. Accordingly, an assessment of landscape and visual effects will be required, including cumulative effects where relevant.*

¹ To cover both the designated area and the setting in same policy wording is in alignment with [§85_CRoW_Act](#) : *"In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty..."* Also demonstrated in [case law](#) (e.g. para. 22) which has indicated great weight that should be given to conserving *and* enhancing landscape and scenic beauty as relevant in the context of development in the setting of National Landscapes.

² NPPF paragraph 190 states permission should be refused for major development other than in exceptional circumstances. Paragraphs 2 and 48 state *"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise."*

Conclusion

1.25 The omission of both a landscape character policy and a dedicated National Landscapes policy is a significant weakness in the Draft Local Plan. They are necessary to ensure that the plan responds properly to the district's landscape sensitivities, its statutory and policy duties, and the presence of two National Landscapes within the plan area.

1.26 The Local Plan should therefore be amended to include both policies before it proceeds to the next stage. Without them, the plan does not yet provide a sufficiently clear, effective or policy-compliant framework for conserving and enhancing the distinctive landscapes of the Forest of Dean, including the Wye Valley and Malvern Hills National Landscapes and their settings.

2. Policy RLP.5 Strategic Sites

Introduction

- 2.1 The Malvern Hills National Landscape Team **objects** to Policy RLP.5.
- 2.2 There is no objection to the principle of RLP.5 within the Local Plan. However, the National Landscape Team considers that the strategic distribution of development proposed through Policy RLP.5 has not been shown to be justified, effective or consistent with national policy insofar as it relates to the Malvern Hills National Landscape and its setting.
- 2.3 Policy RLP.5 carries forward strategic growth, including a major new settlement at Redmarley immediately adjoining the southern edge of the Malvern Hills National Landscape, without sufficient evidence that this approach has been informed by the policy and legislative framework applicable to National Landscapes. Policy RLP.5 therefore embeds a spatial strategy that is likely to give rise to significant harm to the Malvern Hills National Landscape and its setting.

Policy and legislative context

- 2.4 National Landscapes have the highest status of protection in relation to landscape and scenic beauty. Paragraph 189 of the NPPF requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Landscapes and makes clear that development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated area.
- 2.5 Paragraph 11 of the NPPF is also relevant in plan-making, recognising that policies protecting areas or assets of particular importance to the natural environment may provide a strong reason for restricting the scale, type or distribution of development. Protected landscapes fall within that category.
- 2.6 Section 85 of the Countryside and Rights of Way Act (CroW) 2000, as amended, requires relevant authorities to seek to further the purpose of conserving and enhancing the natural beauty of National Landscapes when exercising functions which may affect them.
- 2.7 The Malvern Hills National Landscape Management Plan 2025–2030 is also a material consideration and forms an important part of the policy framework for considering effects on the National Landscape and its setting.

Strategic concerns

- 2.8 Policy RLP.5 establishes the overall distribution of strategic growth across the district, including a substantial new settlement at Redmarley. The current spatial strategy has clear implications for the southern setting of the Malvern Hills National Landscape and effects on the National Landscape itself which are addressed in our representation for RLP.60.
- 2.9 The effect of introducing development proposed by the spatial strategy in RLP.5 includes urbanising an area of open countryside in Redmarley, altering the relationship between dispersed settlement and undeveloped agricultural land. This would materially change the character of the National Landscape's setting, with subsequent adverse effects on the National Landscape itself.

- 2.10 The Regulation 18 material does not demonstrate that the Council has assessed whether a settlement is appropriate in such a sensitive location having regard to the policy protection afforded to National Landscapes.
- 2.11 The draft local plan appears to have been advanced on the basis that harmful effects from RLP.60 can later be managed through masterplanning, landscaping, green infrastructure and phased infrastructure delivery. **The National Landscape Team does not consider that to be a sufficient strategic justification.**
- 2.12 A review of the Regulation 18 evidence base commissioned by the Malvern Hills National Landscape Team concludes that the draft local plan supporting documents do not provide a proportionate or robust strategic justification for carrying forward this scale of allocation adjacent to the National Landscape, and that the SA/SEA is overly optimistic in assuming adverse effects can be reduced to acceptable levels through later mitigation.
- 2.13 Masterplanning may modify or minimise the way harm presents itself, but the Malvern Hills National Landscape Team are deeply concerned that Policy RLP.5 endorses a spatial strategy which relies too heavily on the assumption that later mitigation can make acceptable a strategically harmful location.
- 2.14 There is also a wider strategic concern that the implications of major growth at Redmarley have not been fully considered in terms of cumulative and indirect effects on the National Landscape itself. A major new settlement in this location would likely lead to increase traffic, movement and activity on the rural road network around the southern Malverns, with implications for tranquillity, rural character and the experience of the National Landscape.
- 2.15 It is also likely to increase recreational pressure on the southern hills and on the Malvern Hills SSSI, yet the Regulation 18 material does not demonstrate how those strategic consequences have informed the selection of this location.

Cumulative effects and impacts on the Malvern Hills SSSI

- 2.16 Policy RLP.5 establishes a wider pattern growth in the northern part of the district which, taken together, would materially increase the scale of development in the wider setting of the southern Malverns. In addition to Glynchbrook, there are three further allocations at Bromsberrow Heath within approximately 4km, allocations at Staunton and Corse within approximately 10km, and three allocations at Newent within approximately 14km of the National Landscape. We are also mindful of the growth of Ledbury (in Herefordshire) over recent years and the potential for further development of this town under a new Local Plan currently in preparation.
- 2.17 The cumulative effect of that development around the southern approach to the Malvern Hills is likely to erode the rural, transitional character of the southern setting of the National Landscape, increasing built influence, traffic, movement and general activity across an area which currently reads as relatively open and undeveloped in comparison with the more heavily visited central hills.
- 2.18 A study of the Recreation impacts on the Malvern Hills SSSI was prepared in 2021 to inform the South Worcestershire Development Plan Review (SWDPR). The study identifies that the Malvern

Hills are already subject to significant visitor pressure arising from housing growth across a wide catchment. Increased recreational use has the potential to exacerbate impacts such as soil erosion, disturbance to habitats and species, nutrient enrichment and increased fire risk. The study's findings describe how the ***"southernmost hills are currently much less impacted but are highly vulnerable to any increase in recreation pressure"*** and that there is an urgent need to address recreation pressure on the SSSI, including from new housing which will exacerbate the current pressures. The study therefore stresses that there ***"is a role for strategic planning to ensure adequate protection for the SSSI from future housing growth."***

- 2.19 Due to the wide area of influence that the Malvern Hills have in attracting recreational use, established as 25km by the study, a strategic approach is required to address the pressures on the SSSI. Natural England is therefore working with the Malvern Hills National Landscape Team, stakeholders and landowners on a Strategic Solution for the Malvern Hills SSSI to address where housing growth across several authority areas contributes to measurable damage of the SSSI.
- 2.20 The Regulation 18 material does not demonstrate how Policy RLP.5 has been informed by an assessment of cumulative pressures on the National Landscape, nor does it state what strategic measures are proposed to avoid further harm to the Malvern Hills SSSI

Conclusion

- 2.21 For the reasons given above, the National Landscape Team objects to Policy RLP.5 and considers that Policy RLP.5 proposes a strategically unsuitable pattern of growth near to the Malvern Hills National Landscape.
- 2.22 To be found sound, the policy and supporting strategy would need to show that the distribution of major strategic growth is demonstrably informed by the need to conserve and enhance the Malvern Hills National Landscape and its setting, and by a proper understanding of the cumulative effects of the wider pattern of allocations to the south of the Malvern Hills.
- 2.23 There should also be strategic consideration of the combined effects of growth on the character, tranquillity and rural setting of the southern end of the National Landscape, together with the likely in-combination recreational effects on the Malvern Hills SSSI arising from uplift in population and new settlement growth within its zone of influence.
- 2.24 The detailed objections to Glynchbrook Garden Village are set out separately in the National Landscape Team's representation on Policy RLP.60. That response concludes that the allocation lacks robust strategic justification and should be removed from the draft Local Plan

3. Policy RLP.60 Glynchbrook Garden Village (Redmarley Parish)

Summary of position

- 3.1 The Malvern Hills National Landscape Team strongly **objects** to the proposed RLP.60 Glynchbrook Garden Village allocation.
- 3.2 One Create Environment (OCE) were commissioned by the National Landscape Team to undertake a review of the evidence supporting the Regulation 18 draft local plan. This Landscape Evidence Review has informed and forms part of this consultation response to policy RLP.60 by the National Landscape Team. The report by OCE is appended to this response.
- 3.3 The review concludes that the Regulation 18 evidence base does not provide sufficient evidence to justify the proposed settlement immediately adjacent to the National Landscape. The National Landscape Team agree with this conclusion, but also fundamentally does not consider that the likely adverse effects on the National Landscape and its setting could be avoided or reduced to an acceptable level through masterplanning or mitigation as assumed in the Sustainability Appraisal (SA)/Strategical Environmental Assessment (SEA). **Policy RLP.60 is therefore considered unsound and should be removed from the draft local plan.**

Policy and legislative context

- 3.4 National Landscapes have the highest status of protection in relation to conserving and enhancing landscape and scenic beauty. Paragraph 189 of the National Planning Policy Framework (NPPF) states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes. Paragraph 189 also states that the scale and extent of development should be limited within National Landscapes “***while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.***”
- 3.5 Paragraph 11 of the National Planning Policy Framework recognises that policies protecting areas or assets of particular importance to the natural environment may provide a strong reason for restricting the scale, type or distribution of development in plan-making. Protected landscapes, including National Landscapes, are identified within such policies and should therefore be a key consideration when determining the location and scale of development within a spatial strategy.
- 3.6 Section 85 of the Countryside and Rights of Way Act (CRoW) 2000, as amended by the Levelling Up and Regeneration Act 2023, requires relevant authorities to “***seek to further the purpose of conserving and enhancing the natural beauty***” of a National Landscape, including when exercising or performing any functions that may affect it.
- 3.7 The Malvern Hills National Landscape Management Plan 2025–2030 is a statutory plan prepared under section 89 of the CRoW Act 2000 and is a material consideration in both plan-making and development management. It sets out the vision, special qualities, policies and management priorities for the National Landscape. **The Management Plan is therefore an important part of the policy framework for considering whether plan-making affecting the National Landscape and its setting has properly taken account of the need to conserve and enhance natural beauty.**

Unassessed landscape and visual effects

- 3.8 The proposed allocation would introduce a substantial new settlement into what is a rural, sparsely settled and transitional landscape adjoining the southern edge of the Malvern Hills National Landscape. Development on this scale would urbanise open countryside, erode the rural transition to the southern Malvern Hills, alter the relationship between dispersed settlement and undeveloped agricultural land, and change the character of the southern setting of the National Landscape in a fundamental and irrevocable way.
- 3.9 The effect of introducing a major new settlement here would be to replace open countryside with extensive development, together with the movement, activity, lighting, traffic and infrastructure that would inevitably accompany it. The effects would extend beyond the site itself into the National Landscape including through increased traffic movements, pressure on a network of narrow rural lanes, and the associated erosion of tranquillity at the southern end of the National Landscape.
- 3.10 In visual terms, the allocation is highly likely to affect views to and from the National Landscape and the way in which the Hills are experienced in their wider rural setting. There are significant concerns of the impact the allocation would have on recognised, key viewpoints, such as Chase End Hill which marks the start of the Malvern Hills ridge in the south. There are also concerns of the effect of a major new settlement on the visual relationship between the hills and the surrounding lowland landscape, and the sense of openness, separation and rural context that contributes to natural beauty in this area.
- 3.11 Policy PL1 of the National Landscape Management Plan requires proposals likely to create change in the landscape of the National Landscape to seek to further the conservation and enhancement of natural beauty, scenic quality, setting, views and visual amenity. The Landscape Evidence Base Review identifies that while mitigation may influence the detailed layout and appearance of development, it cannot address the fundamental landscape change arising from the introduction of a settlement of this scale in this location.
- 3.12 It would be very difficult for landscaping, buffering or masterplanning to significantly mitigate the extent of change and likely adverse landscape and visual effects which would materially alter the character and experience of the National Landscape and its natural beauty.
- 3.13 The Malvern Hills National Landscape Team does not consider that these landscape and visual effects are likely to be reducible to an acceptable level through design mitigation alone. The adverse effects from the development would be inconsistent with national policy and the Council's duty to further the purposes of the National Landscape.**

Harm to the National Landscape's Special Qualities

- 3.14 In the context of protected landscapes, "special qualities" are those aspects of natural beauty that make the area distinctive and particularly valued at a national level and provide the basis for its protection, enhancement and management.

Impacts on tranquillity

- 3.15 The special qualities of the Malvern Hills National Landscape include the relationship between the prominent ridge and the surrounding lowland landscapes, expansive scenic views, the rural and undeveloped setting of the hills, tranquillity and dark skies, and the opportunity for quiet recreation and enjoyment of a landscape. The latter is especially experienced in the southern areas of the National Landscape in the context of a quiet, lightly trafficked and sparsely settled rural landscape, with a minor road network, dispersed settlement pattern and relatively limited urban influence.
- 3.16 The OCE review notes the importance of tranquillity as a recognised special quality of the National Landscape and that increased activity from traffic movement and other urbanising influences would have impacts on the designated area itself. The allocation would inevitably introduce – including through recreational use - a marked increase in movement, traffic and activity into this currently quiet rural area, including the Southern Hills and the surrounding network of rural roads and lanes.
- 3.17 Even if infrastructure and highway works are proposed, there is limited work that could increase capacity on the minor road network without causing significant damage. The southern part of the National Landscape is not served by extensive parking or infrastructure capable of absorbing large increases in visitor and traffic pressure. In fact, the opposite is the case. There is a relative paucity of parking spaces for areas at the southern hills and this, coupled with the absence of significant residential developments close by has helped to keep this area quiet and relatively unvisited. A substantial increase in population nearby would inevitably generate more car-borne visits, more roadside parking and greater activity on minor roads and lanes around the southern Malverns.

Impacts on communities

- 3.18 The Management Plan identifies thriving and active communities associated with the National Landscape as one of its special qualities. The rural character and scale of these communities contribute to local distinctiveness, landscape character and sense of place.
- 3.19 The National Landscape Team is not only concerned that the allocation would generate more trips to nearby centres and villages, but that development, especially of this scale, would place additional pressure on the settlements, services and infrastructure that support communities within and around the National Landscape. That in turn has the potential to alter the nature and functioning of those places, which form part of the character, wider setting and special qualities of the National Landscape.
- 3.20 This would be inconsistent with Management Plan policies Policy PL8 on local distinctiveness; Policy PL7 on built development in the National Landscape and its setting, and Policy PE3, including PE3.5, which supports vibrant rural communities and seeks to reduce the need to travel by private car.

Impacts on heritage features

- 3.21 The special qualities of the Malvern Hills National Landscape also include its historic environment. The Management Plan identifies heritage features such as the Iron Age hill forts at

British Camp and Midsummer Hill, together with the Shire Ditch, as special features of the National Landscape.

- 3.22 A substantial increase in nearby population and visitor pressure has potential to negatively affect the condition, experience and appreciation of these heritage assets, particularly where increased recreational use contributes to erosion and wear.
- 3.23 The Management Plan itself notes that recreational pressure can be detrimental to heritage assets and specifically records erosion to the Shire Ditch from informal recreational use. This provides a further illustration that the implications of the allocation on the National Landscape's special qualities have not been adequately addressed in the strategic allocation of Glynchbrook.
- 3.24 In summary, development proposed by Policy RLP.60 would alter the experience of this area from one of relative calm, low traffic movement and lightly settled rural character to one marked by substantially greater vehicular activity, increased noise, and lighting. Those effects would not be confined to the allocation site itself, but would also be experienced through added pressure on heritage and ecological features, nearby villages, and the communities whose character, functioning and rural setting form part of the special qualities of the National Landscape.
- 3.25 The Landscape Evidence Base Review identifies a lack of proper consideration or assessment of these matters within the Regulation 18 documents. The failure to assess likely effects on the National Landscape's special qualities is a significant omission in determining whether the allocation is justified or effective as a strategic site. The likely harm to those special qualities further indicates that the allocation is inconsistent with national policy relating to National Landscapes and demonstrates that the Council has not undertaken its duty to further the purpose of conserving and enhancing natural beauty.

Recreational impacts on the Malvern Hills SSSI

- 3.26 The National Landscape Team is deeply concerned that the draft local plan and supporting documents do not address the effects of the Glynchbrook allocation and the development plan as a whole on the Malvern Hills SSSI.
- 3.27 The Malvern Hills SSSI lies within the National Landscape and reflects the ecological importance and sensitivity of the Hills. The proposed allocation would introduce a substantial new population in close proximity to the southern end of the SSSI designation
- 3.28 A study of the Recreation impacts on the Malvern Hills SSSI was prepared in 2021 to inform the South Worcestershire Development Plan Review (SWDPR). The study identifies that the Malvern Hills are already subject to significant visitor pressure arising from housing growth across a wide catchment. Increased recreational use has the potential to exacerbate impacts such as soil erosion, disturbance to habitats and species, nutrient enrichment and increased fire risk. The study's findings describe how the ***"southernmost hills are currently much less impacted but are highly vulnerable to any increase in recreation pressure"*** and that there is an urgent need to address recreation pressure on the SSSI, including from new housing which will exacerbate the current pressures. The study therefore stresses that there ***"is a role for strategic planning to ensure adequate protection for the SSSI from future housing growth."***

- 3.29 Due to the wide area of influence that the Malvern Hills have in attracting recreational use a strategic approach is required to address the pressures on the SSSI. Natural England is therefore working with the Malvern Hills National Landscape Team, stakeholders and landowners on a Strategic Solution for the Malvern Hills SSSI to address where housing growth across several authority areas contributes to measurable damage of the SSSI.
- 3.30 Where a nationally important site is already sensitive to visitor pressure, it is not sufficient to rely on generic references to site-level mitigation, as indicated in the SA/SEA. An evidence-led framework identifying the scale and geography of the issue, the developments likely to contribute to it, and the measures required to avoid further deterioration and support the site's long-term conservation are required. This is also consistent with the positive duty on public bodies under section 28G(2) of the Wildlife and Countryside Act 1981 to take reasonable steps to further the conservation and enhancement of SSSIs.
- 3.31 This positive duty is demonstrated and tested by the Strategic Solution developed for Hatfield Forest SSSI in Essex. Natural England advised that the site was already being harmed by visitor pressure and that future nearby development would worsen those effects. In response, the relevant authorities, working with Natural England, have put in place a strategic mitigation approach based on a defined Zone of Influence, financial contributions from new housing towards management and monitoring, and a requirement for larger developments to provide or fund Suitable Alternative Natural Greenspace. This demonstrates how a strategic solution is required to address cumulative recreational impacts on a nationally important site, and cannot be deferred to masterplanning, as suggested by the SA/SEA
- 3.32 The Regulation 18 documents do not explain how the implications of additional recreational pressure arising from the Glynchbrook Garden Village and other allocations within the Malvern Hill SSSI Zone of Influence have been considered or assessed.
- 3.33 Mitigation through masterplanning would not sufficiently or viably prevent further harm to the Malvern Hills SSSI from increased recreation pressures arising from the development. Policy RLP.60 is therefore inconsistent with national policy and has not been demonstrated to be justified or effective.**

Lack of strategic evidence

- 3.34 The Landscape Evidence Base review concludes that the Regulation 18 supporting documents do not provide a proportionate or robust strategic justification for the allocation, given its proximity to the Malvern Hills National Landscape and the sensitivities of its setting. It also identifies limited or no explanation as to how landscape character guidance, key views, Management Plan objectives and setting considerations have informed the allocation strategy, and notes the lack of sufficiently clear assessment of tranquillity, recreation and cumulative effects.
- 3.35 The updated Sustainability Appraisal/SEA places considerable weight on the assumption that adverse effects can be reduced through masterplanning, phased infrastructure delivery and mitigation secured under Policy RLP.60. That assumption appears to have contributed to the

reclassification of the allocation such that several effects are now described as neutral or positive.

- 3.36 It is recognised that Regulation 18 represents an early stage in the preparation of the Local Plan and that evidence may continue to evolve as the plan progresses. However, the SA/SEA appears overly optimistic of the extent to which masterplanning can reduce negative effects without evidence to justify the reclassification and inclusion of RLP.60. SEA regulations require that a preferred options must be clearly justified and that all reasonable alternatives and been assessed. **The draft local plan does not provide a robust justification for carrying forward a significant strategic allocation in such a sensitive location adjacent to the Malvern Hills National Landscape.**

Conclusion

- 3.37 The Malvern Hills National Landscape Team strongly objects to the inclusion of Policy RLP.60 Glynchbrook Garden Village in the draft local plan. The National Landscape Team agrees with the OCE Landscape Evidence Base Review that the Regulation 18 material does not provide a proportionate or robust strategic justification for carrying forward a settlement of this scale immediately adjacent to the National Landscape.
- 3.38 Whilst recognising that evidence has not been collected, the National Landscape Team also considers that the allocation is highly likely to result in unacceptable harm to the National Landscape and its setting, including harm to landscape character, tranquillity, dark skies, visual amenity, and the wider special qualities of the southern Malverns. It is also considered that those effects are very unlikely to be mitigated to an acceptable level through masterplanning, landscaping or later design work. As such, the draft local plan places too much reliance on future mitigation and infrastructure assumptions to justify the allocation and on that basis appears to reach an overly optimistic SA/SEA conclusion of effects.
- 3.39 The Council has not demonstrated why a major new settlement in this location is appropriate having regard to the policy protection afforded to the Malvern Hills National Landscape. The current material does not demonstrate compliance with paragraph 189 of the NPPF, which requires great weight to be given to conserving and enhancing landscape and scenic beauty in National Landscapes, nor does it demonstrate how the Council has sought to further the purpose of conserving and enhancing natural beauty in accordance with section 85 of the CRoW Act 2000.
- 3.40 The National Landscape Team therefore considers the RLP.60 policy and overall development strategy as unsound based on the lack of evidence for its justification, effectiveness and compliance with national policy.
- 3.41 For these reasons, the Malvern Hills National Landscape Team objects to the Glynchbrook allocation and considers that Policy RLP.60 is unsound and should be removed from the draft local plan.

4. Policy RLP.4 A Quality Living and Working Countryside

4.1 RLP.4 appears inconsistent with other policies in the draft plan. In particular, RLP.60 Glynchbrook Garden Village as the SA states the location is “*Poorly located for low carbon access to services*”. The resulting reliance on car use will have subsequent impacts on the special qualities of the Malvern Hills National Landscape, in particular tranquillity and pressure on settlements and communities within and in the setting of the National Landscape which contribute to its character. See the representation to RLP.60 for further details.

5. Policy RLP.10 Affordable housing on Rural Exception Sites

5.1 Whilst the general approach to rural exception sites is supported, the policy should provide a clearer National Landscape-specific expectation for schemes within, adjoining, or serving settlements within the Malvern Hills National Landscape, including where only part of a parish falls within the designation. In these circumstances, rural exception sites should be expected to deliver 100% affordable housing feasible. Any market housing should be genuinely exceptional, limited to the minimum necessary to enable delivery, and should not reduce affordable provision below 75%, in line with the Malvern Hills National Landscape position statement on housing.

6. Policies RLP.71–73 Bromsberrow Heath Allocations

6.1 The Bromsberrow Heath allocations should be supported by a clearer landscape-led justification demonstrating why the overall scale, distribution and cumulative pattern of growth at this settlement would conserve the setting of the Malvern Hills National Landscape. The plan itself acknowledges that Bromsberrow Heath is close to the National Landscape and that the settlement is characterised by narrow lanes, high hedges and surrounding agricultural land. While policies RLP.71–73 refer to “potential ecological and landscape impacts”, the wording remains too generic and does not give sufficient confidence that harmful edge expansion, erosion of rural character or adverse landscape and visual effects on the National Landscape and its setting will be avoided. This is particularly important given the cumulative effect of three allocations in one small, sensitive settlement, and the SA’s own findings that parts of the Bromsberrow Heath options could have negative landscape effects, that the National Landscape is close by, and that some larger options were unlikely to meet SA criteria in full.

6.2 The policy wording should therefore be strengthened to require explicit assessment of landscape and visual effects on the Malvern Hills National Landscape and its setting, and to show how layout, scale, boundary treatment and landscaping will respond to the settlement’s dispersed rural character and avoid visually intrusive or poorly integrated expansion.

Appendix A. Landscape Evidence Base Review



Creative
environments

Landscape Evidence Base Review

Implications for the Malvern Hills National Landscape

Regulation 18 Draft Revised Local Plan 2045
Policy RLP.60 Glynchbrook Garden Village

P1783-ONE-ZZ-RP-L-0001

17th March 2026

Executive Summary

This document provides a professional landscape planning review prepared on behalf of the Malvern Hills National Landscape in response to the Regulation 18 Draft Revised Local Plan 2045 consultation. It considers the proposed allocation identified as Policy RLP.60 Glynchbrook Garden Village.

The allocation proposes approximately 3,500 dwellings on land located immediately adjacent to the southern boundary of the Malvern Hills National Landscape (MHNL). The nearest point of the site lies approximately 54 metres from the designated boundary, within the Severn Vale landscape character area. This lowland vale landscape forms part of the wider setting of the designation and is experienced in direct relationship with the rising landform of the Malvern Hills.

National Landscapes are afforded the highest status of protection in relation to conserving and enhancing landscape and scenic beauty. National planning policy confirms that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes. It also states that development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Section 85 of the Countryside and Rights of Way Act 2000, as amended by the Levelling Up and Regeneration Act 2023, requires relevant authorities to seek to further the statutory purpose of conserving and enhancing natural beauty when exercising relevant functions.

In plan-making terms, those considerations should inform the preparation of spatial strategies and the selection of development allocations. For development of this scale in such close proximity to the designated boundary, it would reasonably be expected that the allocation strategy is demonstrably informed by considerations of setting, landscape character and perceptual qualities.

The Draft Revised Local Plan 2045 and accompanying Sustainability Appraisal acknowledge the site's proximity to the National Landscape and identify adverse effects in relation to landscape and character. Policy RLP.60 proposes mitigation and landscape-led design responses to be secured through subsequent masterplanning, and the appraisal relies substantially on these future measures to address identified impacts.

However, the Regulation 18 evidence base does not demonstrate that the implications of allocating development of this scale and proximity to the National Landscape have been examined in sufficient strategic depth at this stage of plan-making. The emphasis within the published material is largely on mitigation and masterplanning to be delivered at later stages, rather than on demonstrating how landscape considerations, including the setting and special qualities of the National Landscape, have influenced the allocation itself. At allocation stage, the evidence base would normally be expected to explain why development of this scale is appropriate in this location before mitigation is relied upon.

In particular, the published material provides limited or no explanation of how:

- Landscape character evidence, guidance and Management Plan objectives have informed the allocation strategy.
- Identified Key Views and scenic quality considerations associated with the National Landscape have been taken into account at allocation stage.
- The scale of population proposed immediately adjacent to the boundary has been assessed in relation to impacts on biodiversity, tranquillity, dark skies, recreation and visitor pressure on the Malvern Hills National Landscape.
- Cumulative landscape and perceptual change within the southern setting of the National Landscape have influenced the spatial strategy.

The current Regulation 18 evidence base does not provide a proportionate or robust strategic justification for carrying forward the Glynchbrook allocation, given its proximity to the Malvern Hills National Landscape and the sensitivities of its setting. On that basis, the allocation is inconsistent with national policy and the legislative framework for protected landscapes. As a location identified for key strategic growth, it cannot be concluded that the policy is justified or effective, and there is a clear risk of soundness issues arising as the plan progresses.

Contents

1. Introduction	4
1.1. Purpose of this Review	4
1.2. Scope of Review	4
2. Policy and Designation Context	5
2.1. National Planning Policy Context	5
2.2. Statutory Purpose and Duties	5
2.3. The Malvern Hills National Landscape	5
2.4. Setting of the National Landscape	6
3. Site and Spatial Context	7
3.1. Strategic Location	7
3.2. Landscape Character and Designations	7
3.3. Settlement Pattern and Landscape Structure	8
4. Consideration of the Draft Revised Local Plan 2045 Evidence Base	9
4.1. Application of the Statutory Duty in Plan Making	9
4.2. Consideration of Setting	9
4.3. Consideration of Landscape Character and Qualities	10
4.4. Landscape and Visual Effects	10
4.5. Sustainability Appraisal and Evidence Base Limitation	11
4.6. Perceptual and Recreational Factors	11
4.7. Cumulative Considerations	12
4.8. Summary Observations on Evidence Base Adequacy	12
5. Summary and Conclusions	14

Plans

- **Plan 01 – Strategic Context**
Location of Policy RLP.60 Glynchbrook Garden Village in relation to the Malvern Hills National Landscape.
- **Plan 02 – Landscape Character and Designations**
Landscape Character Area 6b Severn Vale, environmental and heritage designations, and National Landscape boundary.
- **Plan 03 – Settlement Pattern and Landscape Structure**
Settlement distribution, M50 corridor, and relationship to the National Landscape boundary.
- **Plan 04 – Published Key View Context**
Location of MHNL Viewpoint 50 (Plan L12 / Photosheet 44) in relation to the allocation and National Landscape boundary.

1. Introduction

1.1. Purpose of this Review

This document provides a professional landscape planning review prepared on behalf of the Malvern Hills National Landscape in response to the Regulation 18 Draft Revised Local Plan 2045 consultation.

The review relates specifically to the proposed allocation identified as Policy RLP.60 Glynchbrook Garden Village.

The purpose of this review is to consider whether, at Regulation 18 stage, the proposed allocation is supported by an evidence base that adequately explains and justifies the allocation in the context of the statutory purpose of conserving and enhancing natural beauty, including the setting, scenic quality, biodiversity, heritage, tranquillity and recreational experience of the Malvern Hills National Landscape.

The review examines whether the spatial relationship between the allocation and the National Landscape, including proximity, landscape character, identified viewpoints, tranquillity, population scale and cumulative change, has been assessed in sufficient strategic depth within the Regulation 18 evidence base to justify the allocation at this stage of plan making.

1.2. Scope of Review

This review has been prepared following a structured desk-based examination of the Regulation 18 Draft Revised Local Plan 2045 documentation and associated evidence relevant to Policy RLP.60 Glynchbrook Garden Village.

The material reviewed includes:

- The Draft Revised Local Plan written policies and supporting text
- The Policy Map
- The Sustainability Appraisal and associated appendices insofar as they relate to landscape and National Landscape considerations
- Published landscape character assessments relevant to the site and its wider context
- Other publicly available evidence base material relied upon in support of the allocation

Regard has also been given to published policy and guidance documents relating to the Malvern Hills National Landscape, including:

- The Management Plan 2025 to 2030
- Landscape Strategy and Guidelines
- Published Key Views documentation including Plan L12 and associated photosheets
- Position Statements including Setting and Landscape-Led Development
- Relevant statutory and government guidance relating to Protected Landscapes and the duty to seek to further their statutory purpose

This review is limited to a desk-based consideration of the adequacy of the Regulation 18 evidence base as it relates to the allocation. It does not include site inspection, field survey, verified photography, visual modelling, magnitude assessment or the preparation of mitigation proposals. It does not constitute a Landscape and Visual Impact Assessment.

The commentary therefore focuses on whether the published material at Regulation 18 stage provides sufficient strategic evidence and explanation to justify the allocation in the context of the setting, special qualities and statutory purpose of the Malvern Hills National Landscape.

2. Policy and Designation Context

2.1. National Planning Policy Context

National planning policy confirms that National Landscapes have the highest status of protection in relation to landscape and scenic beauty. Paragraph 189 of the National Planning Policy Framework states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes. It also states that development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Paragraph 11 of the NPPF also recognises that policies protecting areas or assets of particular importance to the natural and historic environment may provide a strong reason for restricting the scale, type or distribution of development in plan making. Protected landscapes, including National Landscapes, form part of this policy framework.

The potential for development outside a designated boundary to affect natural beauty through impacts on setting, scenic quality and experiential qualities is well established in policy and guidance.

2.2. Statutory Purpose and Duties

The statutory purpose of the Malvern Hills National Landscape is to conserve and enhance natural beauty. Natural beauty includes landscape quality, scenic quality, tranquillity, cultural heritage and the relationship between people and place.

Section 245 of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities to seek to further the statutory purposes of protected landscapes. In relation to National Landscapes, this requirement has been incorporated into Section 85 of the Countryside and Rights of Way Act 2000, which states that in exercising or performing any functions in relation to, or so as to affect, land in a National Landscape, a relevant authority must seek to further the purpose of conserving and enhancing the natural beauty of the area.

In the context of plan making, relevant authorities include local planning authorities, the Planning Inspectorate and the Secretary of State. This strengthened duty requires that conserving and enhancing natural beauty is demonstrably taken into account when preparing spatial strategies and selecting development allocations, including where development is proposed within the setting of a National Landscape.

2.3. The Malvern Hills National Landscape

The Malvern Hills National Landscape is defined by its prominent north–south ridge, open hill slopes, wooded escarpments and the relationship between the elevated landform and the surrounding agricultural landscapes.

Its special qualities include expansive scenic panoramas, strong perceptual tranquillity, distinctive landscape character and significant recreational value.

The Management Plan 2025–2030 identifies the protection of tranquillity, conservation of scenic quality, management of recreational use and protection of landscape character as central objectives. The Plan also recognises that change within the setting of the National Landscape may influence natural beauty and the way the designated landscape is experienced.

2.4. Setting of the National Landscape

The setting of a National Landscape is not defined by a fixed distance or boundary. It comprises the surroundings within which the designated landscape is experienced, understood and appreciated, as recognised in the Malvern Hills National Landscape Setting Position Statement.

Guidance on the setting of the Malvern Hills National Landscape confirms that development outside the designated boundary may affect natural beauty where it alters views, landscape context, tranquillity, dark skies or the transition between urban and rural character.

Setting may contribute to:

- The visual backdrop and foreground of the designated landscape
- The perception of openness and separation between settlements
- The experience of tranquillity and relative remoteness
- The sense of arrival to, and departure from, the National Landscape
- The relationship between settlements and the wider surrounding landscape

Consideration of setting extends beyond visibility alone and includes experiential and perceptual qualities which contribute to the natural beauty of the National Landscape.

3. Site and Spatial Context

3.1. Strategic Location

Policy RLP.60 Glynchbrook Garden Village is located to the northeast of Redmarley D’Abitot and to the west of Pendock. The site lies immediately adjacent to the southern boundary of the Malvern Hills National Landscape.

Plan 01 illustrates the location of the allocation in relation to the National Landscape and its wider context. The nearest part of the site lies approximately 54 metres from the designated boundary.

The site falls within Landscape Character Area 6b Severn Vale, forming part of Landscape Character Type 6 Unwooded Vale as defined in the Forest of Dean District Landscape Character Assessment. The Severn Vale is described as a “*deeply rural*” landscape, where the underlying “*varying geology creates a complex mix of arable and pasture farming*”.

Landscape Character Area 11b South Malvern Foothills lies immediately to the north, beyond the National Landscape boundary, and Landscape Character Area 14a Bromsberrow Heath lies immediately to the west. Together these adjoining character areas help define the wider landscape context of the allocation.

In this location, the northern edge of Landscape Character Area 6b is influenced by the rising landform of the Malvern Hills, which form a distinctive backdrop to the vale landscape and contribute strongly to its character and visual context.

The wider landscape surrounding the allocation is predominantly rural in character, with dispersed settlement and a strong agricultural framework extending towards the designated boundary of the National Landscape.

3.2. Landscape Character and Designations

Plan 02 illustrates the relationship between the allocation, landscape character areas and relevant environmental and heritage designations.

As set out in Section 3.1, the site lies within Landscape Character Area 6b The Severn Vale. However, it is located close to the boundaries with 11b The South Malvern Foothills to the north and 14a Bromsberrow Heath to the west. The site therefore sits within a transitional landscape at the southern foot of the Malvern Hills, where the lower lying vale landscape interacts with the rising foothills that form part of the wider setting of the Malvern Hills National Landscape.

The Severn Vale is described as retaining a consistent and coherent character, with surrounding landscapes helping to provide orientation, particularly through views directed northwards towards the Malvern ridge and its foothills.

The South Malvern Foothills, immediately to the north of the allocation, are described as “an important transitional landscape between the Severn Vale and the main body of the Malvern Hills AONB to the north and therefore share characteristics with both.” The Landscape Character Assessment also notes that the historic parklands of Bromsberrow Place were sited to “take advantage of dramatic relief and extensive views over the surrounding landscape.”

These foothill landscapes broadly correspond with the Sandstone Estatelands Landscape Character Type identified in the Malvern Hills AONB Landscape Strategy and Guidelines. This landscape is described as an open rolling agricultural landscape characterised by sandy soils, large regular fields and estate landscapes with parkland planting and dispersed farmsteads. Hedgerow field patterns, estate planting and a network of narrow rural lanes provide a coherent landscape structure that helps frame wider views across the surrounding lowlands.

The interaction between these adjoining landscape character areas contributes to the special quality of dramatic scenery and spectacular views arising from the juxtaposition of high and low ground, which is a defining characteristic of the Malvern Hills National Landscape.

The designated boundary of the Malvern Hills National Landscape lies immediately to the north of the allocation.

The Lowbands Conservation Area lies to the south and south east of the site, reflecting the historic settlement pattern associated with the Lowbands area. Several listed buildings are present within the surrounding rural landscape.

Tudor Cottage Meadows Site of Special Scientific Interest lies to the north beyond the M50 corridor, while Burley Dene Meadows Site of Special Scientific Interest lies to the east. These designations reflect the ecological value of habitats present within the wider rural landscape surrounding the Malvern Hills.

A network of public rights of way is present within the surrounding rural landscape and forms part of the local access framework linking settlements with the wider countryside and the Malvern Hills. However, the M50 motorway forms a physical barrier, and the existing rights of way network does not provide direct connections across it in the immediate vicinity of the site.

3.3. Settlement Pattern and Landscape Structure

Plan 03 illustrates the immediate relationship between the allocation, the surrounding field pattern and the designated boundary of the Malvern Hills National Landscape.

The site comprises agricultural land enclosed by hedgerows and mature field trees, consistent with the wider Unwooded Vale character described in the Forest of Dean District Landscape Character Assessment. The surrounding landscape exhibits a patchwork of pasture and arable fields defined by hedgerow boundaries, small copses and intermittent tree cover, forming a coherent agricultural framework extending towards the boundary of the National Landscape.

Settlement in the area is dispersed in character. The Severn Vale landscape character area is described as “deeply rural” where “few large settlements exist and the predominant form of settlement is in the form of isolated farm houses, hamlets and small villages.” Lowbands lies to the south and south east of the site, with individual farmsteads and dwellings distributed throughout the wider rural landscape. The National Landscape boundary lies immediately to the north, beyond which the landform rises towards the lower slopes of the Malvern Hills.

The M50 corridor runs to the north of the site within the vale landscape and forms part of the immediate context between the allocation and the designated boundary of the National Landscape.

The landform across the vale is gently undulating, rising northwards towards the Malvern Hills, which form a strong visual influence on the northern edge of Landscape Character Area 6b The Severn Vale in this location.

4. Consideration of the Draft Revised Local Plan 2045 Evidence Base

4.1. Application of the Statutory Duty in Plan Making

National planning policy requires that great weight is given to conserving and enhancing landscape and scenic beauty in National Landscapes. This policy framework applies not only to development within designated areas, but also to development within their setting where natural beauty may be affected.

Section 85 of the Countryside and Rights of Way Act 2000, as amended by the Levelling Up and Regeneration Act 2023, requires relevant authorities to seek to further the purpose of conserving and enhancing the natural beauty of a National Landscape.

In plan making terms and having regard to paragraph 189 of the National Planning Policy Framework, it would reasonably be expected that development proposed within the setting of a National Landscape is supported by sufficient evidence to demonstrate that it has been sensitively located, having taken account of the potential for adverse effects on the designated area.

The Regulation 18 Draft Revised Local Plan 2045 acknowledges the proximity of the proposed Glynchbrook allocation to the Malvern Hills National Landscape and the Sustainability Appraisal identifies adverse effects in relation to landscape and character. However, the published material provides limited explanation of how these considerations have influenced the selection, scale or configuration of the allocation within the spatial strategy.

In this context, the available evidence provides limited clarity as to how landscape and setting considerations relating to the Malvern Hills National Landscape have influenced the strategic decision to allocate a development of this scale in such close proximity to the designated boundary.

4.2. Consideration of Setting

Sections 2 and 3 describe the policy context and the spatial relationship between the allocation and the Malvern Hills National Landscape. The allocation lies approximately 54 metres from the designated boundary and within Landscape Character Area 6b Severn Vale, where the land rises northwards towards the Malvern Hills.

The Draft Revised Local Plan 2045 and its supporting documentation have been reviewed to determine how the relationship between the allocation and the National Landscape, including matters relating to setting, are addressed within the evidence base.

This review considers whether the supporting material:

- Identifies the proximity of the allocation to the designated boundary
- Describes the character and function of the adjoining landscapes in relation to the National Landscape
- References relevant guidance and policy relating to setting
- Explains how potential implications for the qualities and experience of the National Landscape have been considered within the plan making process

4.3. Consideration of Landscape Character and Qualities

The allocation lies within Landscape Character Area 6b The Severn Vale, whose northern boundary is defined by the rising landform of the Malvern Hills.

The Sustainability Appraisal recognises that the site lies within the setting of the Malvern Hills National Landscape and records effects ranging between negative and positive in relation to landscape and character. Policy RLP.60 also anticipates mitigation through landscape-led design and masterplanning. However, the documentation provides little explanation of how the relationship between the landscape, and the rising landform of the Malvern Hills influenced the decision to allocate development in this location at plan-making stage.

Published guidance prepared by the Malvern Hills National Landscape includes mapped Key Views and identified viewpoints, including Viewpoint 50 as shown on Plan L12 and associated Photosheet 44. Plan 04 provides spatial context for this published viewpoint evidence by showing the location of Viewpoint 50 in relation to the allocation and the National Landscape boundary. These documents form part of the publicly available evidence relating to scenic quality and views to and from the National Landscape.

The documentation reviewed does not explicitly reference Viewpoint 50 or explain whether identified Key Views have informed the strategic consideration of the allocation at Regulation 18 stage. In the context of plan making affecting land immediately adjacent to the boundary of a protected landscape, the documentation does not demonstrate how available guidance relating to scenic quality and views has been taken into account in the allocation process.

4.4. Landscape and Visual Effects

In considering the potential implications of the allocation, it is important to distinguish between landscape effects and visual effects.

Landscape effects relate to changes to the character, structure and qualities of the landscape itself. The introduction of a large residential development in this location has the potential to alter the existing agricultural landscape framework of the Severn Vale, including field pattern, land use, settlement form and the rural character of the vale landscape adjoining the National Landscape boundary.

Visual effects relate to changes in views experienced by people within the surrounding landscape, including views towards and from the Malvern Hills National Landscape.

The Sustainability Appraisal places considerable emphasis on mitigation and landscape-led design to be secured through masterplanning to conclude that effects on landscape and character will be neutral, owing to the effects ranging between positive and negative across the site. While such measures may influence the detailed layout, landscape structure and appearance of development, they do not address the more fundamental question of whether the introduction of a settlement of this scale within the immediate setting of the National Landscape is appropriate in landscape terms. That question relates to the scale and nature of change proposed within the adjoining rural landscape, rather than solely to the detailed design of development and the impacts arising from the degree of change on the National Landscape itself.

In this context, the available evidence does not explain how potential landscape effects, including the loss of undeveloped agricultural land and the introduction of a substantial new settlement within the vale landscape, have been assessed at a strategic level in relation to the setting of the Malvern Hills National Landscape.

While landscape-led design and mitigation may influence the detailed form and layout of development, such measures cannot fully address more fundamental landscape change arising from the introduction of a settlement of this scale. Effects such as the loss of undeveloped agricultural land, the urbanisation of open countryside, increased traffic on quiet rural lanes, additional lighting, effects on tranquillity, and changes to the perception of transition between settled and undeveloped landscape represent structural changes to landscape character and potential erosion of special qualities that cannot be removed through design mitigation alone.

4.5. Sustainability Appraisal and Evidence Base Limitation

The Sustainability Appraisal forms a central part of the Regulation 18 evidence base used to inform the Draft Revised Local Plan 2045 and to assess the potential environmental effects of proposed allocations.

As outlined in 4.3 and 4.4 above, the Sustainability Appraisal records overall neutral effects to landscape and character, ranging from negative to positive across the site based on masterplanning to mitigate or remove any negative impacts.

Mitigation and design responses will clearly play an important role in shaping development. However, measures that will only be defined through future masterplanning do not in themselves demonstrate that the allocation is appropriate in this location. Masterplanning can refine the layout, form and landscape structure of development, but it cannot retrospectively address the fundamental question of whether a settlement of this scale is suitable within the immediate setting of the National Landscape.

The Sustainability Appraisal appears to place considerable weight on the potential for mitigation when assessing overall effects. This reduces the significance of identified landscape sensitivities at an early stage, even though the detailed form and effectiveness of mitigation measures have not yet been demonstrated.

From the material currently published, it is not clear how the likely residual landscape effects of development at this scale have been assessed in relation to the National Landscape. In particular, the documentation does not explain how potential effects on landscape character, scenic quality, tranquillity and the wider experiential qualities of the Malvern Hills have been considered once assumptions about mitigation are set aside.

Given the scale of the proposed allocation and its proximity to the designated boundary, the Sustainability Appraisal does not demonstrate that the likely landscape implications of the allocation have been fully examined or that the conclusions reached are supported by proportionate strategic evidence.

4.6. Perceptual and Recreational Factors

The statutory purpose of the National Landscape designation encompasses tranquillity, scenic quality and recreational experience. The Malvern Hills National Landscape Management Plan also identifies the protection of tranquillity, scenic quality and the careful management of recreational pressure as key objectives for the designated landscape.

The proposed allocation of approximately 3,500 dwellings represents a substantial increase in residential population immediately adjacent to the southern boundary of the National Landscape.

While the evidence base references green infrastructure and connectivity, it is not apparent from the Regulation 18 documentation how the implications of this scale of development have been examined in relation to:

- Potential increases in recreational pressure on the southern hills and commons
- Effects on tranquillity and perceptual qualities at the rural edge
- Cumulative activity, movement and urbanising influence near the boundary
- Management Plan objectives relating to tranquillity and recreation

The Malvern Hills are also designated as a Site of Special Scientific Interest and are located within the National Landscape, reflecting the ecological importance of the hills and the sensitivity of their habitats to recreational pressure. The proposed allocation lies within the wider catchment of this designation and within the Malvern Hills SSSI Impact Risk Zone. Work by Natural England to develop both a Strategic Solution and Protected Site Strategy for this SSSI recognises the pressures already on it.

While the evidence base refers to mitigation measures to be secured through masterplanning and green infrastructure provision, the documentation does not explain how potential increases in recreational use of the Malvern Hills have been examined at a strategic level in relation to the scale of population growth proposed. No strategic visitor management, recreational capacity or pressure modelling evidence has been identified within the published Regulation 18 material in relation to the proposed scale of development adjacent to the southern boundary of the National Landscape, despite the existence of previous strategic evidence within the wider area relating to recreational pressure study and associated recreation mitigation strategy relating to the Malvern Hills SSSI, which identified that the hills are already subject to significant visitor pressure arising from housing growth across a wide catchment. The study concludes that further housing growth is likely to exacerbate pressures including soil erosion, disturbance, nutrient enrichment and fire risk.

In this context, the introduction of a substantial new settlement near the southern hills raises a strategic question as to whether the implications of additional recreational pressure on the SSSI have been adequately considered within the Regulation 18 evidence base for such a large strategic allocation. In the absence of such analysis, it is not evident how the potential implications of increased population within the immediate setting of the National Landscape have been considered in relation to tranquillity, recreational experience and the management objectives of the Malvern Hills, including the vulnerability of the SSSI.

4.7. Cumulative Considerations

The allocation at Glynchbrook proposes a new settlement of approximately 3,500 dwellings near the Malvern Hills National Landscape. In addition to site specific considerations, it is relevant to examine whether the Draft Revised Local Plan 2045 evidence base addresses cumulative and strategic landscape matters in relation to the National Landscape.

The Sustainability Appraisal assesses the allocation individually and records negative effects in relation to landscape and character. However, the documentation reviewed does not set out in detail how cumulative change arising from the scale of development proposed, together with other allocations or infrastructure proposals within the northern part of the district and adjacent local authorities, have been examined in relation to the setting of the National Landscape.

The evidence does not explain how incremental change within the vale landscape to the south of the Malvern Hills has been considered in strategic landscape terms, or how proximity to the designated boundary has influenced the distribution and scale of development proposed within the spatial strategy in line with NPPF paragraph 189.

While Policy RLP.60 requires mitigation and high-quality design responses, the supporting documentation does not provide an explanation of how cumulative landscape and perceptual considerations have informed the allocation at plan making stage, including recreational pressure on the Malvern Hills SSSI from this allocation and others proposed at the northern end of the District.

4.8. Summary Observations on Evidence Base Adequacy

The Draft Revised Local Plan 2045 and accompanying Sustainability Appraisal acknowledge the proximity of the Glynchbrook allocation to the Malvern Hills National Landscape and recognise that the site lies within its setting. The Sustainability Appraisal records overall neutral effects, ranging between negative and positive in relation to landscape and character considerations, and Policy RLP.60 requires mitigation of identified impacts together with landscape-led design responses.

The evidence therefore recognises the sensitivity of the site's relationship with the National Landscape and the need for mitigation. However, the documentation reviewed provides little to no evidence to demonstrate that adverse effects on the National Landscape can realistically be mitigated through masterplanning.

In particular, the available evidence provides limited insight into how published landscape character guidance, identified Key Views, Management Plan objectives and setting considerations have been taken into account when determining the scale, location and configuration of the allocation within the spatial strategy. There is also limited to no evidence that the implications of the proposed population increase immediately adjacent to the National Landscape's southern boundary, including potential effects on tranquillity, recreational pressure and perceptual transition between the vale landscape and the hills, have been examined in sufficient depth for an allocation of this size at Regulation 18 stage.

Across the documentation reviewed, there is a strong emphasis on mitigation and landscape-led design responses to be secured through masterplanning and later stages of the development process. While such measures may influence the detailed layout and design of development, they do not in themselves provide strategic evidence explaining why a settlement of this scale is considered appropriate within the immediate setting of the National Landscape.

Taken together, the available evidence leaves uncertainty as to how landscape character, setting, tranquillity, recreation and cumulative change have influenced the selection, distribution and scale of development within the emerging spatial strategy.

Based on the material reviewed, the Regulation 18 evidence base does not provide a proportionate or robust strategic justification for carrying forward the Glynchbrook allocation at the scale proposed in this location.

To provide a robust basis for progressing the allocation, further strategic evidence may reasonably be expected to include:

- A strategic landscape sensitivity assessment addressing the setting of the National Landscape
- A dedicated assessment of the relationship between development and the setting of the Malvern Hills National Landscape
- Analysis of recreational pressure and visitor capacity in relation to the Malvern Hills SSSI
- Clearer evidence on the scope, limitations and likely effectiveness of proposed mitigation measures

Taken together, the current material identifies the Malvern Hills National Landscape as a constraint but does not provide a strategic explanation or evidence for why development of this scale has been directed to this location.

5. Summary and Conclusions

This review has considered the Draft Revised Local Plan 2045 allocation at Policy RLP.60 Glynchbrook Garden Village in the context of the setting, special qualities and statutory purpose of the Malvern Hills National Landscape.

The allocation proposes approximately 3,500 dwellings on land in close proximity to the southern boundary of the designated area, representing a substantial new settlement within the immediate setting of the National Landscape. The site lies within Landscape Character Area 6b The Severn Vale, whose agricultural framework and open character form part of the wider landscape setting of the Malvern Hills. The proposed scale of development would introduce a substantial residential population within the immediate southern setting of the designation.

The Draft Revised Local Plan and accompanying Sustainability Appraisal recognise the site's proximity to the National Landscape. Policy RLP.60 requires mitigation and landscape-led design principles to be secured through masterplanning. However, the material published at Regulation 18 stage provides limited clarity as to how landscape considerations relating to the Malvern Hills National Landscape have influenced the strategic decision to allocate this site at this scale and in this location.

While mitigation and design responses are proposed for later stages, the Sustainability Appraisal places considerable reliance on the potential for future mitigation and masterplanning to reduce or remove negative impacts. At allocation stage, the evidence base would normally be expected to explain why development of this scale is appropriate in this location before mitigation is relied upon. The available evidence provides limited explanation of how landscape character, scenic quality, tranquillity, recreational experience and cumulative change have been examined in sufficient strategic depth to demonstrate that these considerations have meaningfully informed the allocation itself.

In particular, the documentation does not clearly set out:

- How the allocation is sensitively located and designed in the setting of a National Landscape.
- How National Landscape Management Plan objectives relating to tranquillity, recreation and nature have been considered in light of the proposed population increase.
- How cumulative landscape and perceptual change within the southern setting of the Malvern Hills has informed the distribution of growth.
- Whether the negative impacts on the National Landscape can be mitigated or avoided to an extent that would ensure compliance with national policy and the National Landscape Management Plan.

From a plan making perspective, it would reasonably be expected that these matters are addressed transparently at the point of allocation, rather than deferred solely to masterplanning and development management stages. The Sustainability Appraisal and supporting plan evidence do not adequately consider the effects of the proposed allocation on the National Landscape and its setting, and there is insufficient evidence to demonstrate that the location is suitable for strategic growth at this scale.

Given the scale of development proposed and its immediate proximity to the Malvern Hills National Landscape, it would normally be expected that the plan evidence base includes a clear strategic assessment of effects on the National Landscape and its setting to inform the allocation decision. This is particularly the case where development of this scale in a sensitive location has the potential to give rise to significant landscape, visual and ecological effects that may affect the natural beauty of the designation.

On the material currently available, the Regulation 18 evidence base does not demonstrate that Policy RLP.60 Glynchbrook Garden Village is justified in landscape terms or that the likely effects on the Malvern Hills National Landscape and its setting have been properly taken into account in the emerging spatial strategy.

Approval Record

Revisions

Ref (-)	Description	By	Date
------------	-------------	----	------

Quality Control

Prepared By:	Joe Pierce	Senior LA	10/03/2026
--------------	------------	-----------	------------

Checked By:	CHECKED BY: Chris Clifton	POSITION: Associate Director	DATE: 17/03/2026
-------------	-------------------------------------	--	----------------------------

Approved By:	APPROVED FOR ISSUE BY: Chris Clifton	POSITION: Associate Director	DATE: 17/03/2026
--------------	--	--	----------------------------





Worcester
01905 362300

Birmingham
0121 312 3876

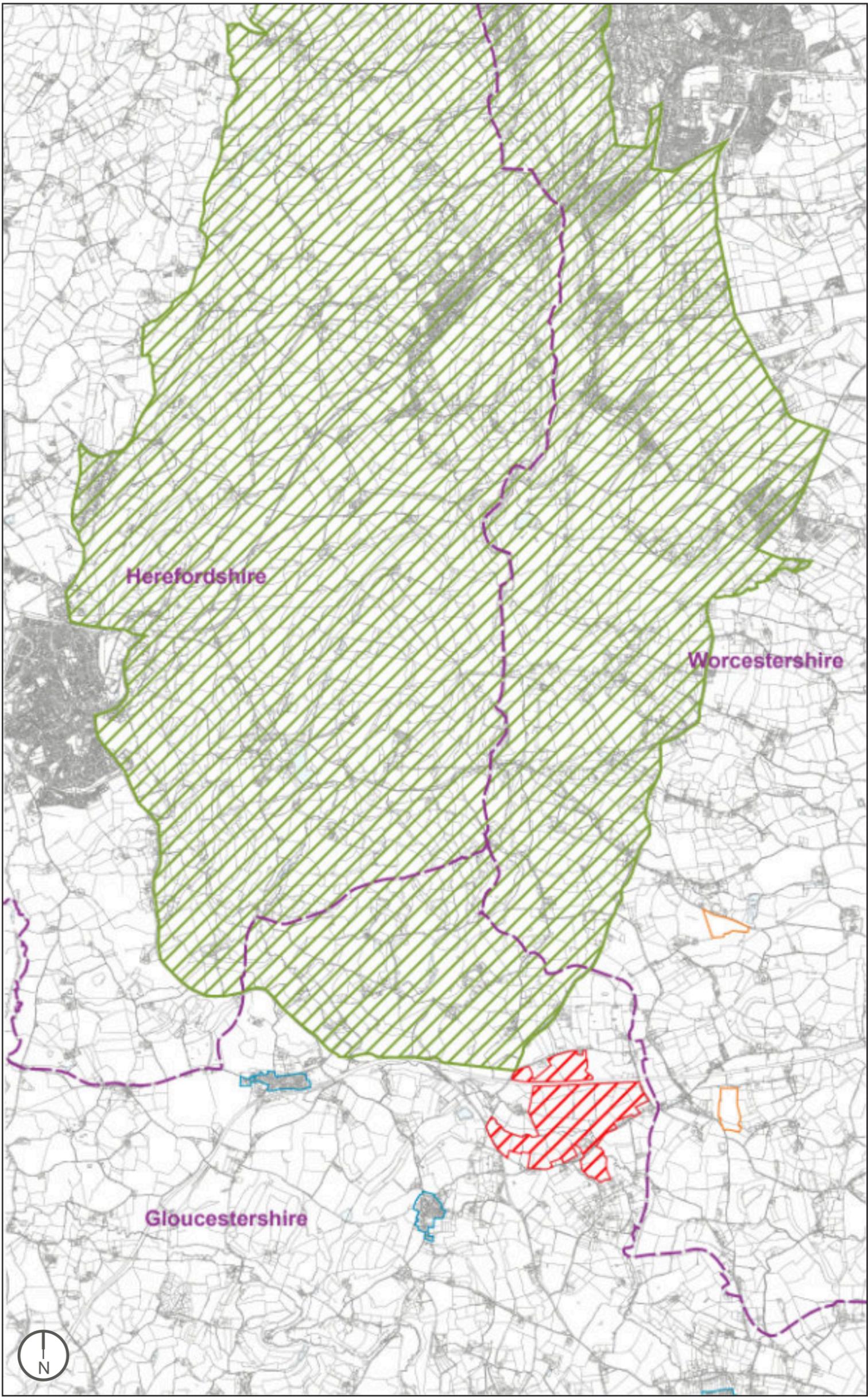
London
0208 059 6526

Cardiff
029 2002 7983

oneltd.com



Appendix B. Landscape Evidence Base Review Plans



- This drawing must not be scaled. All site dimensions must be physically checked on site prior to construction and fabrication.
- This drawing must not be reproduced without full written consent of One Creative environments

Note:
The allocation shown is taken from the Draft Regulation 18 Revised Local Plan 2045. All other information shown is derived from publicly available pre-published documents. This drawing is provided for illustrative purposes only.

P01	FIRST REVISION	P01	JP
REV	DESCRIPTION	DATE	BY

DESIGNER



Worcester 01905 362 300 Birmingham 0121 312 3876 London 0208 059 6526 Cardiff 029 20027983
oneltd.com

CLIENT



PROJECT NUMBER
P1783

PROJECT TITLE
Review of FDC Reg 18

DRAWN BY: JP	POSITION: LA	DATE: 04/03/25
CHECKED BY: Chris Clifton	POSITION: Associate Director	DATE: 18/03/2026
APPROVED FOR ISSUE BY: Chris Clifton	POSITION: Associate Director	DATE: 18/03/2026

DRAWING TITLE
PLAN 01- Strategic Context

DRAWING STATUS
s1 - Issued for co-ordination

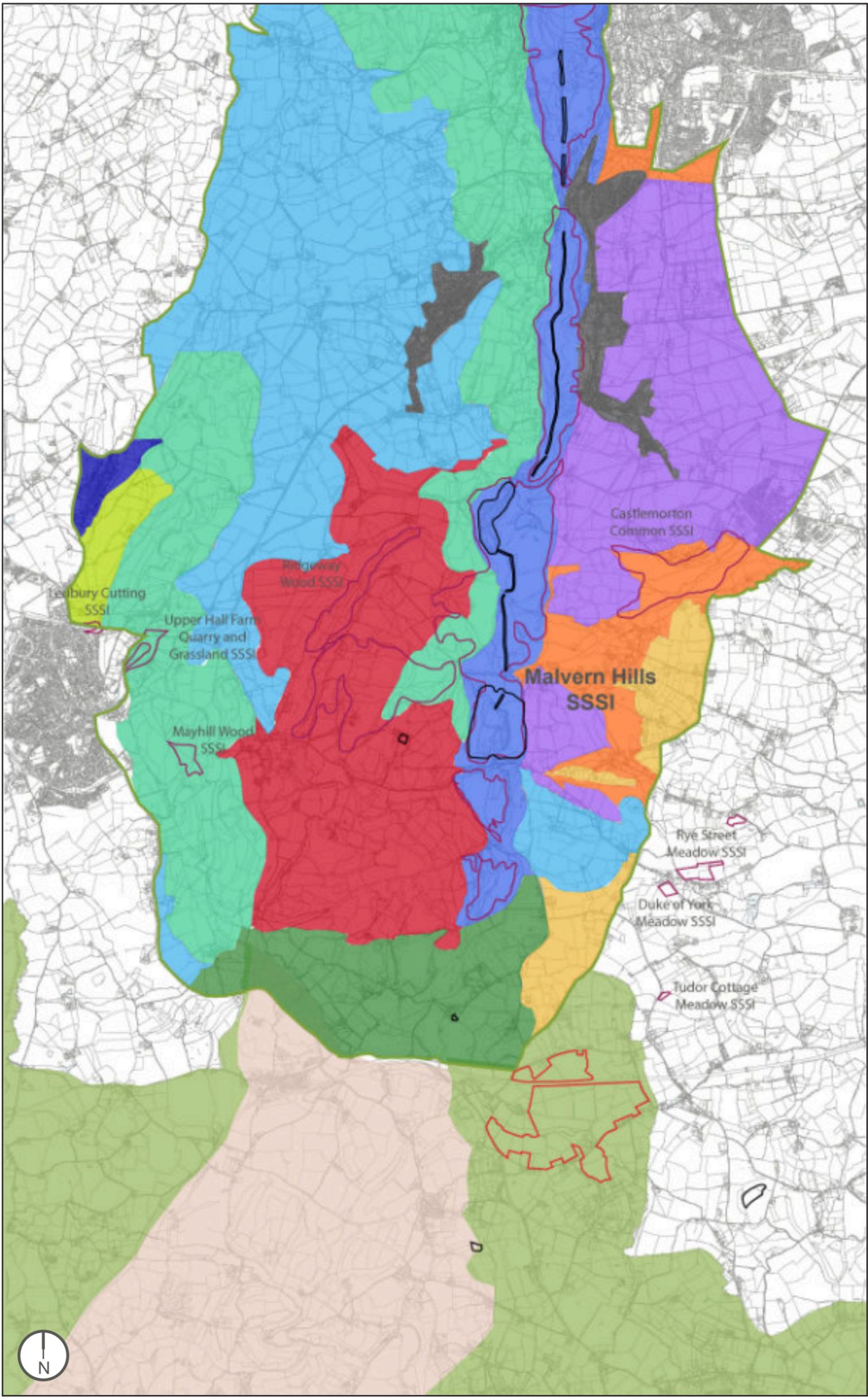
SCALE 1:50,000 DRAWING SIZE A3

DRAWING NUMBER P1783-ONE-ZZ-XX-DR-L-0001 REVISION P01

Key:

	Malvern Hills National Landscape		FoDDC Reg 18 Allocations
	Policy RLP.60 Glyncbrook Garden Village		SWDPR Proposed Allocations
	County Boundary		

©Copyright of ONE Creative environments. No reproduction without written consent from ONE Creative environments.



- This drawing must not be scaled. All site dimensions must be physically checked on site prior to construction and fabrication.
- This drawing must not be reproduced without full written consent of One Creative environments

Note:
The allocation shown is taken from the Draft Regulation 18 Revised Local Plan 2045. All other information shown is derived from publicly available pre-published documents. This drawing is provided for illustrative purposes only.

Landscape character areas derived from the Forest of Dean District Landscape Character Assessment

REV	DESCRIPTION	DATE	BY
P01	FIRST REVISION	P01	JP

DESIGNER



Worcester 01905 362 300 Birmingham 0121 312 3876 London 0208 059 6526 Cardiff 029 20027983
 oneltd.com

CLIENT



PROJECT NUMBER
P1783

PROJECT TITLE
Review of FDC Reg 18

DRAWN BY:	POSITION:	DATE:
JP	LA	04/03/25
CHECKED BY: Chris Clifton	POSITION: Associate Director	DATE: 18/03/2026
APPROVED FOR ISSUE BY: Chris Clifton	POSITION: Associate Director	DATE: 18/03/2026

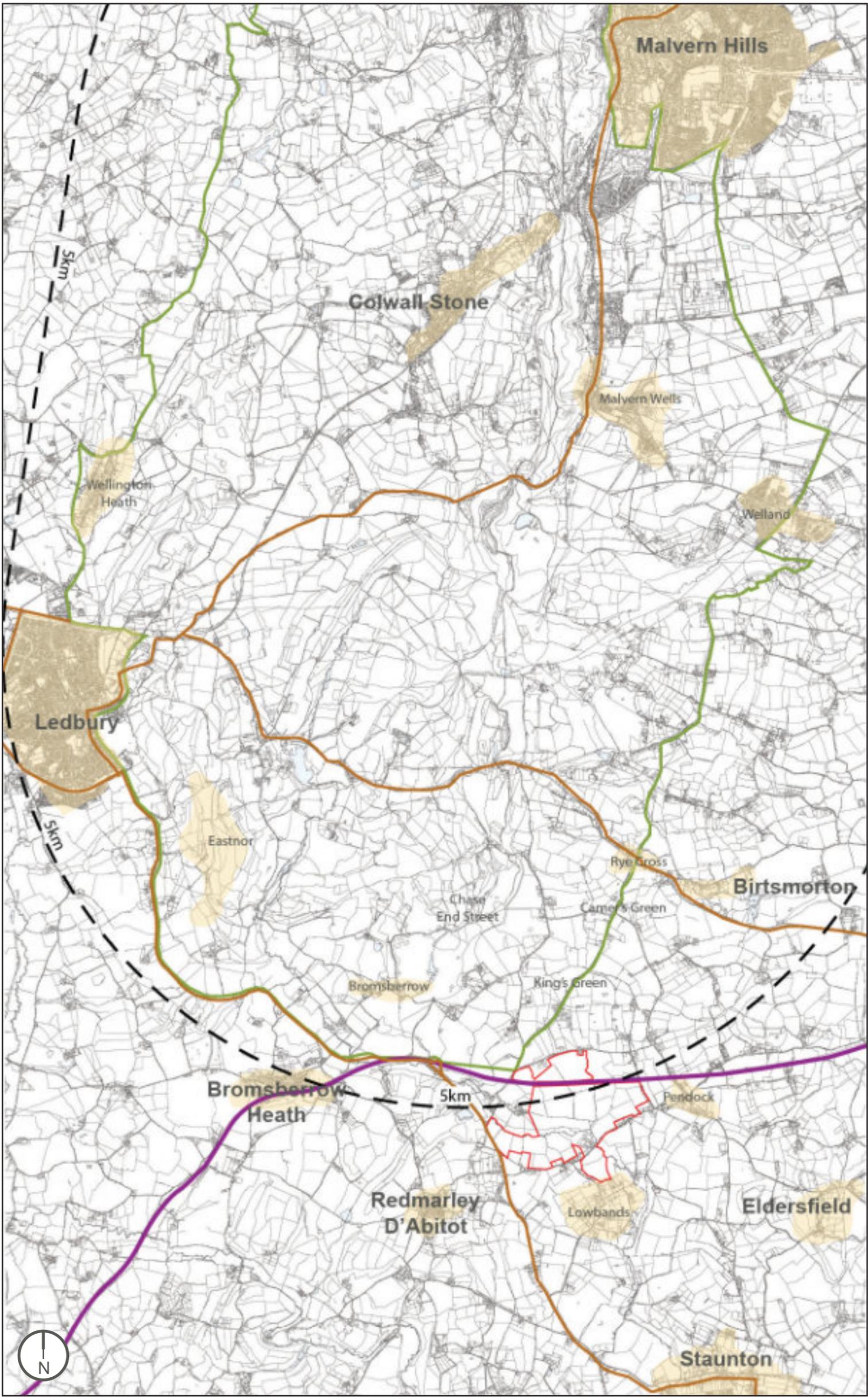
DRAWING TITLE
PLAN 02 - Landscape Character and Designations

DRAWING STATUS	SCALE	DRAWING SIZE	DRAWING NUMBER	REVISION
s1 - Issued for co-ordination	1:50,000	A3	P1783-ONE-ZZ-XX-DR-L-0002	P01

Key:

Malvern Hills National Landscape	FODDC Character Type 14: Low Hills and Orchards	Malvern Hills AONB LCT: Sandstone Estatelands
Policy RLPA0 Glychbrook Garden Village	Malvern Hills AONB LCT: Enclosed Commons	Malvern Hills AONB LCT: Settled Farmlands on River Terraces
SSSI	Malvern Hills AONB LCT: Forest Smallholdings and Dwellings	Malvern Hills AONB LCT: Settled Farmlands with Pastoral Land Use
Scheduled Monuments	Malvern Hills AONB LCT: High Hills and Slopes	Malvern Hills AONB LCT: Unenclosed Commons
FODDC Character Type 6: Unwooded Vale 6b: The Severn Vale / 6c: The Looan Vale	Malvern Hills AONB LCT: Principal Timbered Farmlands	Malvern Hills AONB LCT: Urban
FODDC Character Type 11: Wooded Hills	Malvern Hills AONB LCT: Principal Wooded Hills	Malvern Hills AONB LCT: Wooded Hills and Farmland

©Copyright:ONE Creative environments. No reproduction without written consent from ONE Creative environments.



- This drawing must not be scaled. All site dimensions must be physically checked on site prior to construction and fabrication.
- This drawing must not be reproduced without full written consent of One Creative environments

Note:
The allocation shown is taken from the Draft Regulation 18 Revised Local Plan 2045. All other information shown is derived from publicly available pre-published documents. This drawing is provided for illustrative purposes only.

P01	FIRST REVISION	P01	JP
REV	DESCRIPTION	DATE	BY

DESIGNER



Worcester 01905 362 300 Birmingham 0121 312 3876 London 0208 059 6526 Cardiff 029 20027983
oneltd.com

CLIENT



PROJECT NUMBER
P1783

PROJECT TITLE
Review of FDC Reg 18

DRAWN BY: JP	POSITION: LA	DATE: 04/03/25
CHECKED BY: Chris Clifton	POSITION: Associate Director	DATE: 18/03/2026
APPROVED FOR ISSUE BY: Chris Clifton	POSITION: Associate Director	DATE: 18/03/2026

DRAWING TITLE
PLAN 03 - Settlement Patterns and Structure

DRAWING STATUS
s1 - Issued for co-ordination

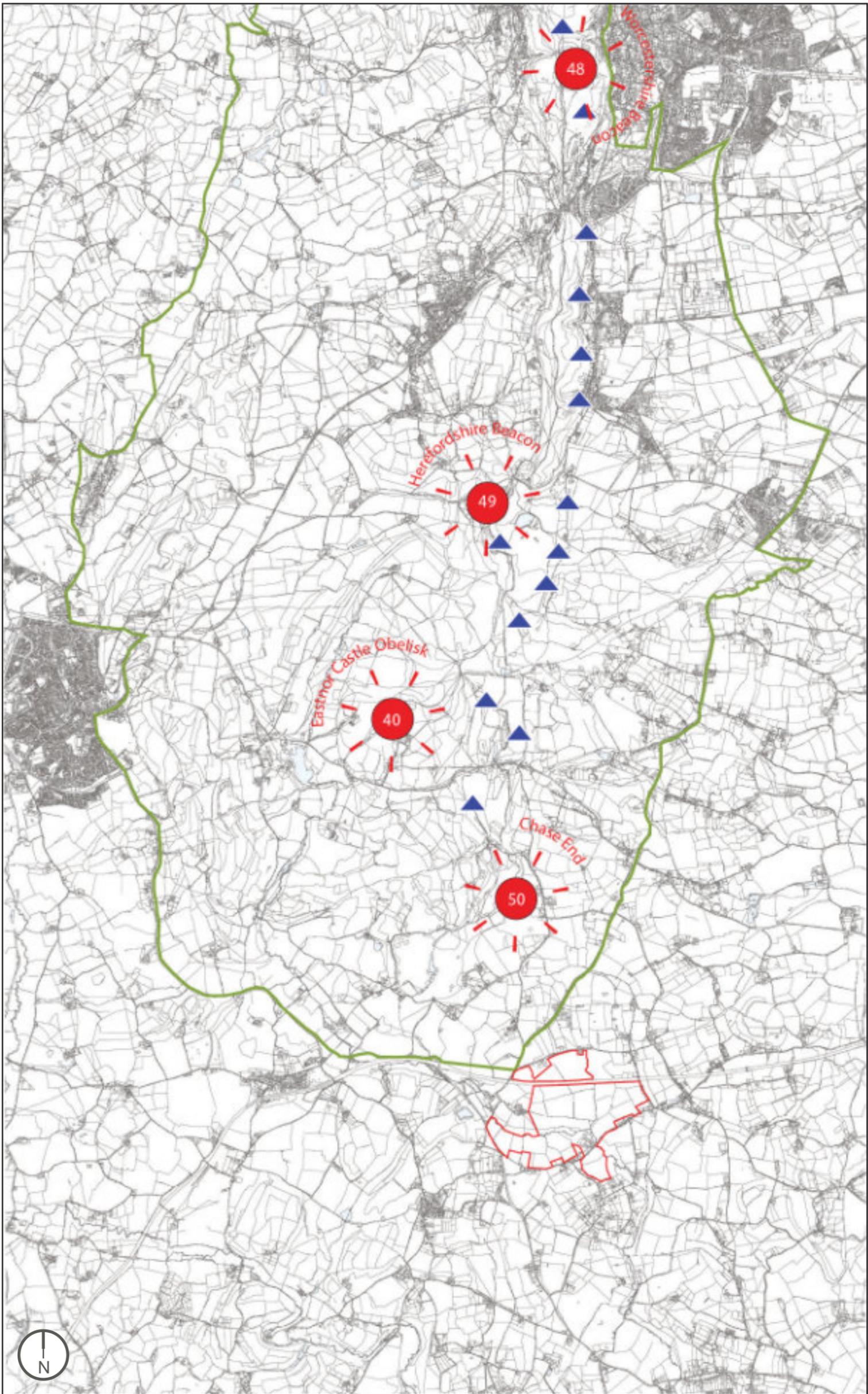
SCALE 1:50,000 DRAWING SIZE A3

DRAWING NUMBER P1783-ONE-ZZ-XX-DR-L-0003 REVISION P01

Key:

	Malvern Hills National Landscape		M50 Motorway
	Policy RLP.60 Glyncbrook Garden Village		Major road (A road)
	Settlements		5km radius based on MHNL photosheet mapping

©Copyright of ONE Creative environments. No reproduction without written consent from ONE Creative environments.



- This drawing must not be scaled. All site dimensions must be physically checked on site prior to construction and fabrication.
- This drawing must not be reproduced without full written consent of One Creative environments

Note:
The allocation shown is taken from the Draft Regulation 18 Revised Local Plan 2045. All other information shown is derived from publicly available pre-published documents. This drawing is provided for illustrative purposes only.

P01	FIRST REVISION	P01	JP
REV	DESCRIPTION	DATE	BY

DESIGNER



Worcester 01905 362 300 Birmingham 0121 312 3876 London 0208 059 6526 Cardiff 029 20027983
onelltd.com

CLIENT



PROJECT NUMBER

P1783

PROJECT TITLE

Review of FDC Reg 18

DRAWN BY: JP	POSITION: LA	DATE: 04/03/25
-----------------	-----------------	-------------------

Checked by: Chris Clifton	POSITION: Associate Director	DATE: 18/03/2026
Approved for issue by: Chris Clifton	POSITION: Associate Director	DATE: 18/03/2026

DRAWING TITLE
PLAN 04 - Published Key View Context

DRAWING STATUS
s1 - Issued for co-ordination

SCALE 1:50,000 DRAWING SIZE A3

DRAWING NUMBER

REVISION

P1783-ONE-ZZ-XX-DR-L-0004 P01

Key:

Malvern Hills National Landscape Malvern Hills Peaks

Policy RLP.60
Glychbrook Garden Village



Panoramic 360° View - Key Viewpoint
Key viewpoint location taken from the Malvern Hills National Landscape
Key Views evidence (Plan L12 / Photosheet 44, Viewpoint 50).