

APPENDIX A

LANDSCAPE CHARACTER ASSESSMENT SPG – SCHEDULE OF COMMENTS

Organisation	Ref:	Summary of Comments	Response and Recommendation
Burghill Parish Council		Congratulations on LCA SPG	The support is noted. Recommendation: no change
	Policy LA6	Query whether HC has a policy to force owners to reinstate deliberately despoiled land	This is a general query, recommend a letter explaining Local Authority powers under the planning system
Country Land & Business Association	2.35 & Fig 2	The analysis & evaluation have exceeded the intentions in PPG7 and resulted in a new landscape designation of “least resilience”. CLA object to landscape designations that are preventative in nature	Abandonment of the analysis and evaluation, as inferred by this consultation response would significantly reduce the usefulness of the LCA as a tool for understanding the landscape and guiding land use change. The LCA is intended as a tool for more sensitive analysis of landscape character for planning policy and development proposals than has previously been possible. “Areas least Resilient to change” are not intended as designations where development will be generally resisted but rather as areas where development impact on landscape character is likely to be the greatest and where particular care needs to be taken in assessing development proposals. Recommendation: Items 10, 78, 79, 80, 81
	Fig 3	Object to wording that states that woodland is inappropriate or there is a presumption against woodland. Farmers are having to look at diversification and this wording is prescriptive	Disagree. The LCA describes the woodland pattern and woodland that does not conform to the inherent pattern will be contrary to the character. Forestry Commission are supportive of the LCA approach. Recommendation: no change
	Fig 2	Concern over the cost to landowners of restoration and conservation conditions	These would be conditioned to planning permissions in the same way that they are now. The wording of Fig2 seeks to point the direction of those conditions not their extent. Recommendation: no change

Countryside Agency		Supportive of the use of LCA and Policy LA2 and supporting text	The support is noted. Recommendation: no change
		The SPG should more clearly set out the contribution that LCA can make to the development of new landscapes and character	Accepted. Recommendation: item 21
		Explain the methodology in greater depth	We think this would be too confusing in SPG. The technical handbook has this information. Recommendation: no change
		The relationship between the HC methodology and the Agency's approach needs to be made clear	Accepted. Recommendation: item 15
		Increase the prominence of stakeholder involvement	Too late to do this. Recommendation: no change
		Increase the explanation of sensitivity	We think this would be too confusing in SPG. The technical handbook has this information. Recommendation: no change
		Training programme for officers and members is needed	Accepted
		Review glossary for completeness	Accepted
		Try to position figures next to relevant text	Accepted but this is not always possible
		Include a summary box at the beginning or end of each chapter	Accepted. Recommendation: item 89
		Divide the guidance into two parts	Disagree. We think this would fragment it too much. Recommendation: no change
		Insert advice on how to use the SPG at the beginning	Accepted. Recommendation: item 4
		SPG uses "inherent" while Policy LA2 uses "intrinsic"	Accepted. Recommendation: Change Policy LA2 to "inherent"
	3.1.3	Rephrase as this is misleading relating to analysis and evaluation	Accepted. Recommendation: item 15
	3.4.8, 6.2.3 Fig2 & 3	Emphasise that LCA can only partly assess the landscapes ability to accept development without due harm – more about other sustainability tools is needed	Accepted. Recommendation: items 22, 38
	6.2.1	Add a flow diagram	Accepted. Recommendation: item 32

	6.2.1	Add an additional step to include site specific considerations	Accepted. Recommendation: add 6th bullet point – “Ensure that detailed proposals fully take into account all site features and that mitigation and enhancement measures conform to and strengthen the key characteristics of the landscape.”
	6.2.1	4 th bullet point needs further guidance to reference settlement pattern	Accepted. Recommendation: item 36
cpm on behalf of The Church Commissioners		The approach in the SPG does not take into account the type and nature of change that has formed the basis for the assessment of resilience for each Landscape Type.	The type and nature of change cannot be taken into account because it will be very variable, based on individual site proposals. This is clearly stated in several places in the SPG e.g. 3.4.8.,6.2.3 The assessment of resilience is based on the sum of the capacity of each landscape character attribute to accept change without undue harm. Recommendation: no change
		The resulting policy or landscape strategies do not identify the criteria for assessing what constitutes a significant change	Accepted, but this would vary with individual site circumstances and would be partially assessed by visual assessment of the proposals. Recommendation: no change
		The SPG does not explicitly recognise that the capacity of the landscape to accommodate change depends on the type and nature of change proposed. The resulting classification for resilience therefore does not take into account the type and nature of development considered acceptable/unacceptable	Strongly disagree that the capacity of the landscape to accommodate change always depends on the type and nature of the change proposed. Some Landscape Types e.g. Unsettled landscape could not accommodate any built development without significant detriment to landscape character. Other settled landscapes will vary in their capacity to accept change. The type and nature of change cannot be taken into account because it will be very variable, based on individual site proposals. Recommendation: no change
		Whilst policy LA21 acknowledges the potential for limited development in areas of Least Resilience, this is based on an assumption that the defined areas are correct and consistent.	We believe that the defined areas are correct and consistent. Recommendation: no change
		Being derived from the SPG the policy appears to relate to the rural landscape and therefore does not take account of the specific needs and	Agreed that a landscape assessment of the urban fringe would be a useful exercise for the future. However, due to the limited extent of the urban fringe in

		pressures that exist on the urban fringe.	Herefordshire it is felt that this can be addressed in detail on a site specific basis as and when required. Recommendation: no change
		No assessment is made in the SPG regarding the visual capacity to change	It is clearly stated that this has not been attempted because it would be site specific and reliant on the nature of the proposals see clause 6.2.3. Recommendation: no change
		By the admission of the draft SPG, the Landscape Character Assessment is only part of the process in assessing resilience. Other work is considered to be vital in strategic land use planning and development control	The SPG does not say that the Landscape Character Assessment is only part of the process in assessing resilience. The resilience assessment is <u>totally</u> dependant on the LCA. Clause 3.4.8 clearly states that the impact on the <u>landscape</u> is only one aspect among others that are considered at strategic planning and development control stages. Recommendation: no change
		The landscape can rarely be compartmentalised along boundaries and there should be a more detailed assessment to define the actual boundary on the ground. Boundaries should not be definitive.	Disagree. The boundary between Landscape Types is more often than not clearly defined. The SPG explains the use of GIS and the consultee should have realised that the scale of the maps shown in the SPG does not reflect the scale of mapping on the ground or on GIS. Boundaries therefore <u>are</u> definitive. Recommendation: no change
		Definitions should be consistent with Countryside Agency definitions.	This LCA was carried out before the Agency guidelines were published. Their guidelines are not prescriptive and it is acknowledged by the guidelines and subsequent Topic Papers that individual LCAs will vary. See re-wording of clause 3.1.3. above. Recommendation: no change
	6.2.1	This advice is wrongly to be applied in a prescriptive manner at a site specific level, contrary to statement elsewhere that the SPG is carried out at Landscape Type scale	The SPG also states in clause 6.1.1 that the Landscape Character Assessment is a powerful tool when considering the landscape at a site specific level. Recommendation: no change
CPRE		Stage 1 and stage 2 need clearer separation	Accepted. Recommendation: items 25, 29
		Object to the Resilience concept as a crude local designation	The LCA is intended as a tool for more sensitive analysis of landscape character in planning policy and development proposals than has previously been possible. "Areas least Resilient to change" are not

			intended as designations where development will be generally resisted but rather as areas where development impact on landscape character is likely to be the greatest and where particular care needs to be taken in assessing development proposals. Recommendation: item 10
		Has stakeholder involvement in stage 2 taken place? Particularly regarding Resilience.	Partial stakeholder involvement. This consultation is part of that. Too complicated to involve wide ranging stakeholder involvement at Stage 2 discussions. The original funding partners were invited to participate in Stage Two but only the CPRE accepted.
		The relationship between the LCA, HLC and UDP needs to be clarified	Accepted Recommendation: items 11, 14.
		Technical background paper is required on the “countryside” to support the UDP’s Natural and Historic Heritage chapter	This role is fulfilled by the various SPGs
English Heritage		Welcomes the characterisation approach	The support is noted. Recommendation: no change
		No explanation of the background and role of the HLC or how the two studies will complement each other. Cross references should be made	Accepted Recommendation: items 11, 14
English Nature		The attributes need to be refined to introduce categories that encompass the inherent quality of a feature rather than a purely visual assessment.	Disagree. This is not purely a visual assessment – see clause 3.3.3(b). The attributes have been arrived at through an exhaustive process involving other Local Authorities, the Countryside Agency and external consultants. English Nature were also involved at the beginning of this process. This is a landscape assessment, not an ecological assessment and it is important that the difference is maintained. Introducing ecological detail will confuse and devalue the assessment. The consideration of features is too detailed and should be left to site specific evaluation. . Recommendation: no change
	7.1, 7.2, 7.5	Amend the text under “Enclosure pattern” to acknowledge the need for peripheral fencing and internal temporary stock enclosures etc	Accepted. Recommendation: items 43, 44, 51
		HC to extend fruit tree kits and grant scheme	Outside the remit of the SPG

		Unclear how vulnerability is assessed	This is apparent if the Technical Handbook is consulted
		Contest the 15 year short term replaceability of hedges. Trailing roses, hedgerow trees and butterflies will not appear within 15 years.	Do not state that the ecological value of a hedge can be replaced within 15 years. The SPG clearly sets out that it is a landscape character assessment and does not pretend to include an ecological assessment. Hedgerow trees are not considered as short term replaceable (see Appendix A A4.2) Recommendation: no change
		Contest the medium term replaceability of trees because they will not have the cultural, architectural/visual or nature conservation context	Disagree. See above. Recommendation: no change
		Not possible to replace ancient woodland	In the long term, it is possible although it may take several hundred years. The HCL identifies many ancient woods that show clear signs of medieval or earlier enclosure and therefore agriculture which implies clear felling. Recommendation: no change
		There should be more than 2 categories of Resilience	There are. These are shown in the Technical Handbook but felt to be too complicated for inclusion in the SPG. Recommendation: no change
		Sensitivity offers the possibility of including some of the quality measures lacking at Landscape Type scale	Accepted but this is outside the remit of the SPG. Recommendation: no change
		Concerned that analysis of Land Cover Parcels will replace Environmental Impact Assessment	No intention that it will replace EIA. Sensitivity could contribute to EIA but will only address some of the aspects covered by EIA. See clause 2.2.1(i)
		Concerned that the SPG appears to favour the preservation of the existing landscape character rather than the relict nature and functions of the landscape and that this will limit the scope for landscape change in the future.	The whole point about LCA is that it provides a vehicle for understanding the elements that contribute to landscape character. Decisions about whether or not to change the character have to be made on a site specific basis. Recommendation: no change
	Appx A	Appendix A is too complicated. Do not feel it meets the tests of being open, transparent, consistent and robust	The changes suggested would make this Appendix more complicated. Much of the criticism would be addressed by reading the full explanation of methodology contained in the Technical Handbook. The methodology <u>is</u> complicated and that is why it was not all incorporated into the SPG. Recommendation: no change
		Attach maps along right hand edge.	This would increase the printing costs.

			Recommendation: no change
	Fig 8	Cross reference Landscape Type page numbers on Fig 8	Accepted
		Colours do not show up well on small scale maps in Part 2	This is probably the best that can be done
Forestry Commission		Generally welcome LCA	The support is noted.
	2.2.1. (ii)	Agree with this wording	The support is noted. Recommendation: no change
	Fig 3	Some of the wording is too dogmatic. Change “is” to “may be” and “No. Presumption against woodland” to “Amend proposals or presumption against woodland”	Changing “is” to “may be” will weaken the LCA process. Recommendation: item 82
	7.10, 7.14, 7.15, 7.22	Wording about woodland is too dogmatic	Some opportunity for change in emphasis. Recommendation: items 60, 64, 77
	Appx A	Virtually incomprehensible. SPG is in danger of being devalued through misunderstanding, misrepresentation and problems in utilisation unless this methodology can be simplified	We acknowledge that the evaluation methodology is complicated but this is an inevitable consequence of LCA. The evaluation methods described by the Countryside Agency in Topic Paper 6 are no simpler. It is not really necessary to understand the intricacies of the evaluation methods in order to use the SPG fully.
Environment Information Services on behalf of “The Friends of the Golden Valley” and “The Friends of the Black Hill”		Where landscape character exhibits tranquillity, naturalness, etc. suggest there is a policy predisposition against wind turbines	Wind turbines would be addressed through the usual planning controls. Recommendation: no change
	Fig 2	Flow chart should be used in conjunction with questions about need and alternative sites and the concept of resilience should be calibrated.	This chart is clearly labelled as a working tool. The issues of need and alternative sites are taken into consideration separately by the Planning Officers. If Resilience was calibrated it would become too

			complicated to be used efficiently. Recommendation: no change
	Chap 4	Provision must be made for the inclusion of landscapes outside the county boundary, especially in the case of highly visible proposals like wind turbines	Visual impact assessment would address this. Para 2.2.1(i) states that LCA would be included as part of VIA and EIA not replace them. Recommendation: no change
	Chap 4	Sub-regional Character Area of Ewyas is too bland.	The character area descriptions are held in the Technical Handbook. Descriptions of Landscape Description Units will give much greater detail and pick up local distinctiveness. Recommendation: no change
	Chap 5	The concept of Resilience is accepted.	Support is noted.
		Do not understand how Significance can be unambiguously included. There is the potential to compromise its concept with “significance” as used by EIA	There is inevitably a degree of subjectivity when assessing the consistency and visual prominence of Significance. Recommendation: no change
	7.2	Think that grazing <u>is</u> a factor in maintaining the character	Accepted. Recommendation: item 44
	7.2	Do not agree that this Landscape Type is under less threat than any other because of the threat from wind turbines	This is still less threat than most other Landscape Types
	7.3	A better title would be Enclosed Former Moors and Commons	Agree but it is too late to change now because these Landscape Types are being used regionally. Recommendation: no change
		Remainder of notes and comments relate entirely to the potential effect of wind turbines and therefore are not comments on the SPG	
Gloucestershire County Council	Fig 9	Forest of Dean Sub-regional Character Area would be better named “Forest of Dean and Lower Wye”	Agree but it is too late to change now because these Sub-regional Character Area are being used regionally. Recommendation: no change
		Gloucestershire’s LCA for the Forest of Dean has just reached final draft and does not mesh seamlessly with Herefordshire Lca. Would like Herefordshire to change	Disagree, it might have been helpful if Gloucestershire’s consultants had contacted Herefordshire. Recommendation: no change
Herefordshire & Worcestershire Earth Heritage		Wonderful document!	Support noted.

Trust			
		Little reference to geology. Is this in the Technical Handbook?	Yes
	Page 7	Geodiversity is mentioned but not defined in Glossary.	Accepted. Recommendation: item 93
	4.2.4	Alter outdated wording	Accepted. Recommendation: items 26, 27
	4.2.4, 4.2.11 & Fig 6	Alter outdated wording	Accepted. Recommendation: items 28, 85
Hereford & Worcester Gardens Trust		Support the aims and objectives of the SPG	The support is noted. Recommendation: no change
Herefordshire Nature Trust		Wet woodland is not represented and would warrant a separate Landscape Type	Whether woodland is wet or not is immaterial to the landscape character at Landscape Type scale. Landscape Types are defined on the full range of indicators, not just woodland. Recommendation: item 64
		What is the definition and size of woodland	Depends on the Landscape Type and is stated in the descriptions
		Coppicing should be encouraged	Outside the remit of this SPG
		Ponds should be encouraged	Agreed, but this is individual site management and outside the remit of the SPG
		Should focus on the landscapes as they were prior to agricultural intensification	Impractical. Recommendation: no change
		Alter wording regarding hedgerows in Landscape Type	We consider that the proposed alternative wording does not alter the sense of the existing and would introduce an element of confusion. Recommendation: no change
		No mention of quarries	Too detailed. Recommendation: no change
		Encourage hay production	Agreed, but this is individual site management and outside the remit of the SPG
	7.1	Disagree with suggested compromise of reducing grazing on lower slopes	This is a suggestion & should be kept. Recommendation: no change
	7.2	Temporary fencing may be necessary	Accepted. Recommendation: item 46
		Stronger emphasis on discouraging ploughing or improving grassland	Accepted . Appropriate wording will be strengthened throughout
	7.3	Comments re. Hedges & ponds and encourage road	Accepted. Recommendation: item 49

		verge and hay meadow management	
	7.4	Comments re. Hedges & ponds. Why no woods, change text to encourage woods	Woodlands are not a feature and therefore not appropriate. These are very small areas. Recommendation: no change
	7.5	Include hedgerow statement	This is unenclosed landscape and therefore hedges are not a feature. Recommendation: no change
	7.6	Comments re. Hedges & ponds	Ponds are not a feature. These are steeply sloping areas. Recommendation: no change
	7.7	Extend the wording to encourage more woodland planting	Wording already says this. Recommendation: no change
	7.8	Woodland pattern should include scope to increase age diversification through coppicing, widening rides and encouraging ponds	This is individual site management and outside the scope of the SPG
	7.9	Include hay meadows and verge management	Hay meadows are not a feature, verge management is outside the remit of the SPG Recommendation: no change
	7.10	Plant black poplar and hazel as well as oak	Black poplar is not suitable except as very occasional specimen trees and hazel is a shrub. Oak are the dominant tree in these LTs Recommendation: no change
	7.11	Comments re. Hedges & ponds	We consider that the proposed alternative wording does not alter the sense of the existing and would introduce an element of confusion. Recommendation: no change
		Extend woodland to previous size and composition	What size and composition? Most of the woodland was once open farmland. Extending the size of the woods will alter the character. Recommendation: no change
	7.12	Encourage ponds and hay meadow management	This is detailed site specific management. Recommendation: no change
	7.13	Comments re. Hedges & ponds	We consider that the proposed alternative wording does not alter the sense of the existing and would introduce an element of confusion. Recommendation: no change
	7.14	Add wet woodland	Accepted. Recommendation: item 64
		Add fencing banks to improve habitat	This is not LCA
	7.15	Add fencing banks to improve habitat	This is not LCA

	7.16	Change wording for veteran trees	Disagree because this is sometimes ornamental veteran trees. Recommendation: no change
		Change to tree belts of <i>local</i> species	Disagree because plantations are part of the character. Recommendation: no change
	7.17	Change wording to promote large scale woodlands	Disagree because the character is of small estate woodlands. Recommendation: no change
		Encourage pond creation	Agreed but this is not landscape character at this scale. Recommendation: no change
	7.18	Enforce all TPOs	Outside the remit of this SPG
		Encourage Black poplar planting	Black poplar is not suitable except as very occasional specimen trees. Recommendation: no change
	7.19	Enforce all TPOs	Outside the remit of this SPG
	7.20	Reinstate ponds	They are detailed features outside the remit of this SPG and not commonly found in this sandy soil. Recommendation: no change
	7.21	Increase orchards	Agree. Recommendation: add item 75
		Restore former woodland	Woodland is not a feature of this character type. Recommendation: no change
		Contest the 15 year short term replaceability of hedges. The ecological value of an ancient hedge cannot be replicated in this time	Do not state that the ecological value of a hedge can be replaced within 15 years. The SPG clearly sets out that it is a landscape character assessment and does not pretend to include an ecological assessment. Recommendation: item 90
		Contest the medium term replaceability of trees because they will not have the cultural or visual context	Disagree. The LCA does not address the cultural value of individual features and in visual terms a tree will make a strong statement in the landscape in 50 years (sweet chestnut cropping regimes are under 60 years). Recommendation: no change
		Not possible to replace ancient woodland	In the long term it is possible although it may take several hundred years. The HCL identifies many ancient woods that show clear signs of medieval or earlier enclosure and therefore agriculture which implies previous clear felling.

			Recommendation: no change
	Glossary	No definition of Veteran trees or woodland	Accepted and added to Glossary
Highways Agency		Welcomes the LCA SPG	The support is noted. Recommendation: no change
Kington Town Council	Page 83	Unacceptable to have the statement that the analysis will replace AGLV only in the Appendix and not in the main body of the SPG or in the UDP	Accepted. Recommendation: item 10
		Do not object to the method of identifying the LTs.	The support is noted. Recommendation: no change
		Object to the evaluation of significance, vulnerability, tolerance & resilience. Consider the mathematical system used to be spurious.	The evaluation methodology is generally recognised by practitioners as being one of several alternative and equally valid methods of evaluating Landscape Character Assessment. Dealing with such a wide range of factors requires some sort of codification of the judgements that are made at each stage as well as a way of combining layers of judgements together to arrive at a final solution. The scoring approach is one such method which is generally accepted as valid. Recommendation: no change
		Ask for the SPG to be withdrawn and the analysis and evaluation section to be removed.	This would render the LCA unusable for planning purposes. Recommendation: no change
Ledbury Town Council		Document is too complicated. Would like to see a more user friendly guide	Consider this is user friendly. Recommendation: no change
Llangarron Parish Council		Fully support the proposals	Support is noted. Recommendation: no change
Malvern Hills Conservators	Page 32,33	The SPG has been produced without recourse to the Worcestershire LCA, the AONB management plan and the Malvern Hills Conservators management plan	The Herefordshire and Worcestershire LCAs were carried out together and therefore dovetail. The Malvern Hills AONB management plan is being rewritten to take full

			account of the two counties LCAs. Minor changes to text can be made so that there is no perceived conflict with the Conservators management plan. Recommendation: no change
		Not accurate to say that the Malvern Hills are principally wooded hills	The LCA actually says they are High Hills and Slopes. Recommendation: no change
	Page 32	Difficult to see the Malvern Hills on thumbnail plan	Accepted but it may not be possible to do better
	Page 33	Rewrite “forces for change “ in the light of the management plans	This section complies with the management plans. Recommendation: no change
		Temporary fencing may be needed to facilitate grazing	Accepted. . Recommendation: item 43
	Page 34	Alter “grazing is not a major factor” etc.	Accepted. Recommendation: item 44
Malvern Hills AONB	Page 35	Alter text regarding fencing	Accepted. . Recommendation: item 46
Mason Richards Planning		No recognition of an urban edge character in the LCA. There is a sharp line between urban and rural with development density reflecting the rural character but at the urban edge it should reflect the urban form	Accepted but an urban edge character assessment has not been carried out. Normal site analysis would pick up the most appropriate density for urban extension. Recommendation: no change
NFU	6.2.1	Areas of least resilience are too restrictive. This is a designation & contrary to par 4.16 of PPG7as it will unnecessarily restrict rural development	The LCA is intended as a tool for more sensitive analysis of landscape character in planning policy and development proposals than has previously been possible. “Areas least Resilient to change” are not intended as designations where development will be generally resisted but rather as areas where development impact on landscape character is likely to be the greatest and where particular care needs to be taken in assessing development proposals. Recommendation: item 10
		Allow development which undertakes specific mitigation measures which are not prohibitive on the grounds of cost.	An applicant can always appeal if he thinks that mitigation requirements are unreasonable. Recommendation: no change

Penny Farquhar-Oliver		What happened to the Character area descriptions	These are in the technical handbook
		Like the layout and format of the LTs section	Support is noted. Recommendation: no change
		Think that the descriptive section should have been made available separately some time ago so that it could be a stand alone document	This could not then be a SPG
		Object to the evaluation, particularly the resulting resilience	The evaluation methodology is generally recognised by practitioners as being one of several alternative and equally valid methods of evaluating Landscape Character Assessment. Dealing with such a wide range of factors requires some sort of codification of the judgements that are made at each stage as well as a way of combining layers of judgements together to arrive at a final solution. "Areas least Resilient to change" are not intended as designations where development will be generally resisted but rather as areas where development impact on landscape character is likely to be the greatest and where particular care needs to be taken in assessing development proposals. Recommendation: no change
RPS Chapman Warren on behalf of BT plc	2.1 – 3.3	Generally endorse	Support is noted.
	3.4.4	Consider the wording of this clause will prevent further development of existing sites.	Don't agree, clause 3.4.8 makes it clear that landscape character is only one aspect of planning consideration. . Recommendation: no change
		Further consideration needed re. sites that are included in the landscapes least Resilient to change which do not accord with the Landscape Type description. Madley SES does not fit into Wet Pasture Meadow description and should be excluded from the area of least Resilience	6.3.1 Clause 6.2.2 addresses this anomaly. Recommendation: item 37
		Provision should be made for introducing mitigation	Disagree that development should not be

		measures to minimise the impact of development. Development should not be presumed against unless assessed against a criteria approach	presumed against unless assessed against a criteria approach as there are some Landscape Types where no built development would be appropriate and in all other cases the criteria would have to be tailored to the individual site and the proposed development. The point about mitigation measures is acknowledged. Recommendation: items 40, 41
		In respect of already developed sites within areas of least Resilience, account should be taken of the need for further development that may outweigh any adverse impact on landscape character.	Clause 3.4.8 makes it clear that landscape character is only one aspect of planning consideration. Recommendation: item 23
		Confusion over the use of “water meadow” and “riverside meadow”, alter to clarify	Accepted. Recommendation: item 63
		Include “water meadow, meadow and pasture” in glossary	Accepted. Recommendation: item 94
RMC Aggregates		The terminology used in association with landscapes of least Resilience is overly restrictive & will restrict future operation of the Lugg Bridge quarry.	No intention to restrict operations that already have permission. Future operations unlikely to be significantly restricted through LCA. Para 3.4.8 makes it clear that landscape character is only one aspect of planning consideration. Recommendation: no change
	Fig.2,	The term “Presumption against development” is inconsistent with the policies of the UDP	Not inconsistent with the intention of the UDP. Recommendation: item 78
	3.4.4	“Directing away” does not accord with the wording of UDP policy LA2	Accepted Recommendation: item 16
	2.3	SPG is proposing to extend a local landscape designation through the use of areas least Resilient to change. Contrary to PPG7 as there are other policies that provide the necessary level of protection – S7, LA5, LA6	Do not agree that policies S7, LA5, LA6 give the necessary protection as they do not address the principal of development against the character of the landscape. The LCA is intended as a tool for more sensitive analysis of landscape character in planning policy and development proposals than has previously been possible. “Areas least Resilient to change” are not intended as designations where development will be generally resisted but rather as areas where development impact

			on landscape character is likely to be the greatest and where particular care needs to be taken in assessing development proposals. Recommendation: item 10
	Section 5, Appendix A	Methodology is complex and difficult to follow and requires the information held in the Technical handbook to understand it fully.	Agree but feel that to simplify will make it more obscure. Recommendation: no change
		Propose that the SPG is reworded in a way that acknowledges that minerals can only be worked where they occur and that the impact of these developments is best considered at LCP level	Accepted. Recommendation: item 21
Welsh Newton & Llanrothal GPC		Support the SPG	Support is noted. Recommendation: no change
Worcestershire County Council	1.1 (& Figure 3)	Reading the last sentence here, it is confusing and unclear as to the purpose of the SPG. PPG 12 paras 3.15 and 3.17 clearly state that an SPG must be clearly referenced to the relevant plan policy it supplements. Moreover SPG should not be used to introduce decision making criteria that has not been introduced within the development plan. The confusion arises therefore from the inclusion of 'somewhat broader advice' that is beyond the influence of the planning system.	This sentence is meant to indicate that the SPG could be useful in a broader remit to inform non development control matters eg parish plans. Recommendation: item 5
	2.1.3.	Designations are referred to as a 'rather blunt planning tool' yet the resilience work is (later) presented as an 'in or out of' boundary designation, all areas within the boundary being treated differently than those outside, which seems no different to the concepts of the current AGLV designation, save it covers different areas.	It is difficult to justify AGLV but areas of least Resilience can be justified through the methodology process. The LCA is intended as a tool for more sensitive analysis of landscape character in planning policy and development proposals than has previously been possible. "Areas least Resilient to change" are not intended as designations where development will be generally resisted but rather as areas where development impact on landscape character is likely to be the greatest and where particular care needs to be taken in assessing development proposals. Recommendation:

			item 10
	Page 8.	Policy LA3 What is meant by ' open areas into development' and 'surrounding valued countryside'. What is valued about these areas of countryside and how are they defined.	This is a comment on UDP policy
	3.2b.	Where are the Herefordshire Landscape Character areas described and what is their purpose?	LCA descriptions are in the technical handbook (see para 4.1.2, 4.2.12)
	3.4.4.	As long as new development does not damage the least resilient attributes of a landscape, will change be allowed? Without it, the socio-economic well-being of communities in these areas is severely stifled. The tone of the document, and the resilience map in particular, seems to suggest the whole landscape is sacrosanct in areas of landscape of least resilience. As the methodology was developed in partnership with Worcestershire, and the same terminology will be used in the Worcestershire SPG, will there be a perception that landscapes of least resilient will be approached this way in Worcestershire? Implications could arise, particularly in joint projects i.e. Malvern Hills Management Plan, where resilient/least resilient landscapes are referred to, with greatly differing implications. The need for some sort of compatibility in approach and perception of these terms and their usage is to be preferred.	Agreed that compatibility is needed. No intention that the whole landscape will be sacrosanct in areas of least resilience. Recommendation: item 16
	3.4.5	Need to emphasize that we are talking about the 'inherent' character of the landscape in these instances, not its current appearance – which might be construed from 'areas where woodland is already a characteristic feature'. The example given is misleading, there is no reason why 'blocks of commercial forestry' cannot be introduced into areas of ancient woodland as long as certain characteristics - i.e. irregular boundary, mixed broadleaf composition. The whole purpose of landscape character should be positive, trying to encourage viable land use but to try to make it complementary to landscape character rather than be negative from the start. Condition and basic landscape character should be the primary considerations, for example in directing woodland	The inherent character is emphasised elsewhere – 3.4.1, 3.4.3, 6.2.2, However it could also be clarified in 3.4.5 Recommendation: item 17

		planting, areas in existing landscape types where woodland is a characteristic, but is currently poorly represented, (i.e. in poor condition) should be the priority areas. Resilience doesn't really play a part at this primary level. The aspect of 'condition' could, and perhaps should, include the aspect of capacity - for example, a wooded landscape may already be sufficiently wooded, and the introduction of more woodland could push it's woodland characteristic to that of a different landscape type. (i.e. what should be discrete blocks of woodland could become interlocking belts)	
	3.4.6.	This approach to resilience, taking the landscape as a whole, is far too clumsy and misses the finesse the methodology allows. Resilience can be explored and used as a tool at a much finer level of analysis, attribute by attribute, rather than a black or white, resilient or least resilient. Where is any allowance made for condition in this distinction. Is development still deflected away from an LDU of landscape of least resilience if it is in very poor condition, with all the attributes that define its low resilience irreparably damaged? The assessment should look at the impact the proposed change is likely to make to the landscape, and the degree to which it will damage the least resilient attributes. An example is given of future housing land allocation potentially affecting the dispersed settlement pattern of certain least resilient landscapes. Dispersed settlement is similarly a characteristic of several resilient landscape types, and the guidance in the respective landscape type descriptions suggests avoiding new development that would dilute this characteristic. How does this equate to the resilient/least resilient designation?	Accept some of this argument and some extra wording to explain that resilience (and other levels of analysis) can be assessed attribute by attribute might be helpful. The assumption was that this is obvious and that the wording was trying to simplify what appears to be a complex methodology. Recommendation: item 18
	3.4.7	Again a poorly worded example, the primary purpose of landscape character should be to indicate firstly the type of tree cover, if any, that would be appropriate in such an instance. The wording implies 'blocks' are acceptable whereas individual trees or linear belts may represent the inherent character.	Blocks are used as an example only. Recommendation: item 20
	4.1.2.,	Where are the descriptions for these, and the mapped	In the technical handbook (4.2.12)

	4.1.1	boundaries? 4.1.1. indicates that the descriptive classifications, forming the first of the two stages of the process, are 'described in this section of the SPG'	4.1.1 says that the first phase is set out in the SPG, it does not say that all the descriptions are in the SPG. Recommendation: item 24
	4.2.2	This is not how it was undertaken. The desk based analysis defined the field study units, which in turn were modified to become the LCP's. The LDU's were derived from the LCP's at a later date.	Herefordshire's LCA process was a mixture of the two. It started out with field study units leading to LCPs and then LDUs but later on the consultant altered the methodology and many of the final LCPs were derived from amended LDUs. To explain all this would result in total confusion for the reader therefore we have kept to that aspect of the process which conforms to the consultants latest methodology which has been advocated by the Countryside Agency
	Fig 2	The question 'Is development appropriate' seems to relate purely to settlement. Does there need to be a division between development and settlement (i.e. a wind farm), may be appropriate in areas where settlement isn't. If we are talking about general development, the overall resilience of the landscape may well be appropriate. When talking about settlement only, the resilience of the settlement pattern is probably the primary concern. The questions could then be: i. is it a landscape where settlement is characteristic yes/no. if yes ii. Does the proposal respect the inherent settlement pattern of the landscape. New development might well be appropriate in least resilient areas as long as it is not damaging the least resilient attributes. It would be advisable to refer to the 'inherent' settlement pattern as opposed to the 'historic' settlement pattern - there could be several 'overlays' of the latter.	This Fig. Relates to general development. It does not state that all development will be refused in unsettled landscapes, but there will be a presumption against it. In exceptional circumstances development may be acceptable but there needs to be a stronger statement at the beginning of the chart than later on. Recommendation: items 78, 79, 80, 81
	Fig 3.	In addition to the comments raised above, this causes confusion over the interpretation of tree cover character. The first question asks if the landscape is wooded or unwooded. Tree cover character is divided into more than simply wooded or unwooded categories, there are landscape types that have no woods but plenty of tree cover and those where hedgerow tree cover is dominant but still have woodlands. What does the	Yes, but the point of the exercise is that it is new woodland that is being considered (see title of Fig 3) not hedgerow trees. Accepted that the option to modify proposals that do not respect the tree cover character could be added . Recommendation: items 82, 83

		<p>wooded/unwooded differentiation at the start of Fig 3 refer to - landscapes without any tree cover (trees or woods) or landscapes without woodlands as a dominant attribute? 'Unwooded' is an attribute of Tree Cover Character, along with 'ancient', 'planned' and 'trees'. The second question then asks if the proposal reflects the tree cover character - presumably sieving the remaining three attributes. If the answer is no, there is a presumption against the woodland, with no option for redress. This is wrong. There is no reason why a proposal for a plantation type woodland in an area of ancient woodland type, could not be modified to reflect the ancient character. If the proposal doesn't respect the tree cover character, there should be the option to modify it. There is no suggestion of considering capacity What do you end up with, with the scenario in the bottom right of the flow chart - a landscape in poor condition , the character further wrecked by the introduction of inappropriate woodland planting. Thought should be given to the attributes that render the landscape to be in poor condition in the first place and proceed cautiously from there.</p>	
	5.5.2	<p>Replacing the AGLV with what amounts to a similar designation seems to go against the advice of PPG 7. As mentioned before, resilience used in this way is clumsy - condition needs to be taken into account, particularly as an indicator to influence large scale forestry creation, or to indicate areas of least damage (to landscape character) for new or expanded transport routes etc.</p>	<p>“Areas least Resilient to change” are not intended as designations where development will be generally resisted but rather as areas where development impact on landscape character is likely to be the greatest and where particular care needs to be taken in assessing development proposals. Recommendation: item 30</p>
	6.1.2.	<p>The LCP data base does contain highly detailed information. It is misleading to suggest that Landscape Character Assessment can be made of individual sites - this is site evaluation. (Landscape is defined as larger than the individual site and smaller than global scale) Landscape Character is concerned with defining patterns or recurring features, individual site assessment is not focused on this. Local Distinctiveness is something different again, concerned with memories, special features/the unique etc</p>	<p>Some confusion over the terms distinctiveness and character. Recommendation: item 31</p>

	6.2.1	As said before, this effectively blights development over much of Herefordshire. Will the same presumptions be made for least resilient landscapes in Worcestershire once it is widely known that the same methodology was used by both counties. When relating to settlement, need to assess first of all if the settlement proposed is in accordance with the inherent settlement pattern for the landscape type.	Recommendation: item 34
	6.2.2.	Confuses condition and 'features'. Poor condition relates to the representation of the inherent attributes. The presence of features such as commons or areas of parkland needs clear clarification as their treatment will relate to their own specific inherent character, which is far different to that of condition of the landscape type they happen to be in This is a very confusing paragraph. What is the analysis of the character of the immediate area, how does this differ from the assessment of the landscape type of the LDU?	6.3.2 Accepted. Recommendation: items 37, 39
	6.3.3	Is 'significant' referring to attributes of primary significance - after all, all attributes have been assessed in terms of their significance. Is 'enhancing' putting more of an attribute into the landscape than would be suggested by its inherent character? (Otherwise it would be the same as restoration) How is this justified? By attaching a 'banner' of restoration, conservation or enhancement to a landscape type, it implies that all attributes are in need of this approach throughout the area of the Type - is this justifiable - the assessment enables a far more detailed approach to be made at LDU level which is to be preferred. In defining priorities for conservation, restoration etc, far greater use could be made of the resilience analysis to identify priorities.	Significant does mean attributes of primary significance. Some clarification is needed. Recommendation: items 40, 41
H.C. GIS (internal consultation)	Fig. 8,9,11,12	All A3 maps require Ordnance Survey copyright statement	Accepted. Recommendation: item 88
H.C. D.C. Planning (internal	Section 7	The Landscape Type descriptions of settlement pattern do not necessarily conform to UDP policy which could lead to confusion	Accepted. Recommendation: items 48, 50, 53, 54, 58, 59, 61, 62, 66, 68, 70, 72, 74, 76

consultation)			