

Responses to Consultation on Renewable Energy Position Statement, including National Landscape Team Response and Changes

This document details the consultation responses received to the consultation undertaken by the Malvern Hills National Landscape Team on the 'Renewable Energy in the Malvern Hills National Landscape and Its Setting' draft Position Statement. Comments submitted are provided, along with the National Landscape Team response, along with (if applicable) the tracked changes to the draft Position Statement. Further work to correct grammar/spelling and re-formatting, which has not been included in the responses below, has been undertaken. A revised National Planning Policy Framework (NPPF) was published on 19 and 20 December 2023. During consultation, amendments to the Countryside and Rights of Way Act (2000) also took effect. Hence, these policy and legislative changes are reflected in the Position Statement. The National Landscape Team wishes to thank those who formally responded and engaged with this consultation.

Consultee	Nature of comment	National Landscape Team response (in draft)	Change (if needed)
Member of Public 1	Climate change is the overriding existential threat to our environment, way of life, prosperity and landscape. Therefore, opportunities for local renewable energy generation should be exploited wherever possible, to combat finite fossil fuel use and its associated damage. We should take on board that we collectively have a moral duty to generate the energy we consume from our own renewable resources. We should not be forcing this need of ours upon others. We should stand up and be responsible for our own consumption. This is not only for our own local good but also for the good of our nation and the whole planet. A carbon neutral Malvern Hills would be a wonderful legacy to aspire to for the next generation and beyond.	Thank you for the response. We agree and this is why we have developed this position statement that provides guidance for multiple forms of renewable energy generation that is compatible with the protection and enhancement of the AONB designation and its special qualities. For example, the position statement supports the use of heat pumps, domestic and micro scale solar energy generation, micro or small-scale hydropower schemes, small scale anaerobic digestion plant schemes, locally sourced wood and fuel and woody biomass schemes, residential stand-alone wind turbines, and actively calls for policy that would mandate rooftop PV generation. We have provided guidance to ensure appropriate consideration is given to the design and locations of these so that important, and legally protected, natural resources and features are not compromised. Without good design, renewable energy implementation in the National Landscape and its setting may harm the 'Special Qualities' of AONB designation, for instance through scale or the introduction of extraneous elements within the landscape. The response does not require	None.

		amendments to the draft Position Statement to be made.	
Elected Member 1	I am a member of the JAC and I believe that the question of enabling alternative energy without damage to the sensitive Natural Landscape area has been well thought out and balanced.	Thank you for the response. The response does not require amendments to the draft Position Statement to be made.	None.
Parish Council 1	<p>In section 6.1.5, you state that “6.1.5 Heat pumps use electricity so still potentially contribute to greenhouse gas emissions (depending on the source of the electricity). However, they can offer carbon emission savings of around 30% when compared with conventional gas boilers”. We are surprised the savings are so low; we would have expected more than 30%. Do you have a reference for the that figure?</p> <p>In section 6.2.4.3 you state that “Use of domestic woodburning stoves should not be encouraged...”. We would go further and change this to “Use of domestic woodburning stoves should be discouraged...”.</p> <p>These are minor comments; we agree with the general tenor of the document.</p>	<p>Thank you for the response.</p> <p>Regarding your question about section 6.1.5: Our phrasing reflected one specific source (a Carbon Trust report dated from 2020). However, we accept that such data does vary depending on the parameters of the study, the efficiency of the boiler to which the heat pump is being compared to, and the source of the electricity being used to run the heat pump.</p> <p>One research article for example suggests the 30% figure; notably it looks at the whole lifecycle analysis of heat pumps and gas boilers. https://www.sciencedirect.com/science/article/abs/pii/S0378778821001493</p> <p>Meanwhile Hamworthy Heating (https://hamworthy-heating.com/Knowledge/Articles/Heat-Pumps-Role-in-the-Net-Zero-Goal) cite the Carbon Trust report of “heat pumps used for heating can offer carbon emission savings of around 30% when compared to conventional natural gas boilers but when heat pumps are partnered with a renewable electricity supplier, heat generation is 100% carbon neutral”.</p> <p>Carbon Brief (https://www.carbonbrief.org/heat-pumps-are-the-central-technology-for-low-carbon-heating-concludes-iea/) reports that the International Energy Agency “estimates that heat pumps currently cut emissions by at least 20% compared to a gas boiler even when running on emissions-intensive electricity. This can rise to 80% when running on a cleaner grid.”</p>	<p>Section 6.1.5 amended to read <i>6.1.5 Heat pumps use electricity so still potentially contribute to greenhouse gas emissions (depending on the source of the electricity). However, they can offer carbon emission savings of at least 20%, rising to 100% when their operation is compared with that of conventional gas boilers.</i></p> <p>A footnote has also been added at the end of 6.1.5: “We accept that data does vary depending on the parameters of a study, the efficiency of the boiler to which the heat pump is being</p>

		<p>We have therefore amended the wording to be more accurate to this range of results and created a footnote to provide further reference.</p> <p>Regarding your question about section 6.2.4.3: We note your point suggesting that domestic woodburners should be discouraged but consider it appropriate to retain the existing phrasing. We acknowledge the evidence regarding particulates in the text and we state that the use of woodburners should not be encouraged.</p>	<p><i>compared to, and the source of the electricity being used to run the heat pump.</i></p> <p><i>One research article for example suggests the 30% figure; notably it looks at the whole lifecycle analysis of heat pumps and gas boilers.</i></p> <p><i>https://www.sciencedirect.com/science/article/abs/pii/S0378778821001493</i></p> <p><i>Meanwhile Hamworthy Heating (https://hamworthy-heating.com/Knowledge/Articles/Heat-Pumps-Role-in-the-Net-Zero-Goal) cite the Carbon Trust report of “heat pumps used for heating can offer carbon emission savings of around 30% when compared to conventional natural gas boilers</i></p>
--	--	---	--

			<p><i>but when heat pumps are partnered with a renewable electricity supplier, heat generation is 100% carbon neutral".</i></p> <p><i>Carbon Brief (https://www.carbonbrief.org/heat-pumps-are-the-central-technology-for-low-carbon-heating-concludes-iea/) reports that the International Energy Agency "estimates that heat pumps currently cut emissions by at least 20% compared to a gas boiler even when running on emissions-intensive electricity. This can rise to 80% when running on a cleaner grid."</i></p>
Parish Council 2	Overall, **** Parish Council are very supportive of the Statement. It seems to be a very sound and thorough overview of the opportunities and challenges with Renewable Energy related	Thank you for the response. We have read the detailed comments of the **** NDP and attachment as suggested and noted that the relevant key extracts	None.

	<p>developments in AONBs and Conservation Areas which includes clear consistency with the NPPF and specifically Sections 15 and 16.</p> <p>Detailed comments are included in the **** Neighbourhood Plan and the relevant key extracts are in Section 6.8, p.72 which recognises **** role in supporting low carbon alternatives through renewable energy schemes, as well as promoting sustainable design and energy efficiency in buildings in the design policy. Detailed builds/comments have been provided in the separate attachment with specific notes within the relevant sections linked to the MH Draft Position Statement.</p> <p>Recommendations would include the importance and need to continuously review the advice and guidance from the appropriate and trusted national organisations in the Renewables space given the exponential growth in technologies and innovation pace in this area.</p>	<p>are substantially consistent with the draft Position Statement.</p> <p>It was agreed that the JAC Meeting of 10 November 2023 that a formal review date of the position statement is to take place every five years. If amendments to the Position Statement are needed to be made, primarily as a result of a change in legislation, such as updates to Planning Policy, it is understood that this amounts to a non-material amendment which can be made by the Malvern Hills National Landscape Team, to ensure the Position Statement does not become 'out-of-date'.</p> <p>The response does not require amendments to the draft Position Statement to be made.</p>	
Agency 1	<p>We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications. While we welcome this opportunity to give our views, we do not wish to provide specific comments.</p>	<p>Thank you for the response. The response made does not require amendments to the draft Position Statement to be made.</p>	None.
Member of Public 2	<p>First of all, this is a very well-written and comprehensive document – well done. It covers a lot of ground, but is concise and not repetitive. There's enough detail and info for it to be clear, but not too much to bog the reader down.</p> <p>I find it easier to write responses in Word / tracked changes, so ended up transposing the PDF into Word manually. I have several comments and questions.</p>	<p>Thank you for the response. The consultee has submitted the Position Statement with revised proposed tracked changes to many aspects of the document.</p> <p>On the back of this, a face-to-face meeting was held between the Planning Officer with the consultee to discuss the comments and get an understanding and explanation of the amendments proposed. We have noted all the comments in the tracked changes document.</p> <p>We welcome the comments and input on landscape and visual sensitivity and capacity assessment and considerations associated with solar installations and</p>	<p>Changes throughout the position statement in terms of the wording 'impact' and 'effect'.</p> <p>Changes to 4.1.1 in respect of correct references of LCTs such as the Landscape Strategy & Guidelines</p>

		<p>have made changes to reflect the evidence and references provided.</p>	<p>Guidance aims, and new footnote to advise updates to Herefordshire Council's LCA. Revised wording of 'solar farm' as it is not a type of farming.</p> <p>Changes to 4.1.2 with a more landscape focused starting point approach, updated reference to HCA given county by county variation.</p> <p>New section 4.1.3 to cover visualisation/CGIs</p> <p>Revised Section 4.1.4 recognising that assessments include independent and more granular character baseline studies to identify localised differences in character which often occur within LCT.</p>
--	--	---	---

			<p>Revised 4.1.6 in terms of clarifying biodiversity value and also identifying clear benefits to local community.</p> <p>At 4.2.1, a new footnote to guide reader to LI Guidance on Tranquillity.</p> <p>Revisions to 4.2.3 in light of appeal decisions on 'large-scale ground mounted solar PV installation' to ensure consistency and robustness.</p> <p>Addition at 4.4.2 in respect of BNG obligations.</p> <p>New footnote at 5.1.2 to refer to National Policy Statements. 5.1.2 also expanded to include consideration of all cumulative effects.</p>
--	--	--	--

			<p>Previous paragraph deleted. 5.1.4</p> <p>5.2 - new footnote to make reference to NSIPs, noting that there is potential for such applications within the setting of the NL.</p> <p>5.3.2 expanded and careful re-wording, including new footnote, to explain the difference between mitigation, compensation and enhancement.</p> <p>5.4.2 - new footnote with reference to Guidance on Views and Viewpoints and Guidance on Respecting Landscape in Views.</p>
--	--	--	---

			<p>5.5.4 is re-worded to accord with GLVIA3.</p> <p>Re-wording to two recommendations of Section 5 to clarify high biodiversity value in the context of greenfield vs brownfield and also policy requirements.</p> <p>Amendments to 6.4.1.2 to ensure development does not compromise distinctive characteristics of different LCTs e.g. by spanning across two contrasting types of LCT; Reword to emphasise that a) can't mitigate LC effects by screening, b) can't rely on vegetation to screen; more about amenity especially residential, and RVAA; omission of Site PV development in</p>
--	--	--	--

			<p>areas that already contain signs of human activity and development as could read off as a solar landscape. ensure large scheme elements can be delivered to site without damage to / loss of landscape elements / features.</p> <p>6.4.3.2 re-worded to “PV panels mounted on buildings are considered more suitable than those that are freestanding as they are likely to have fewer adverse effects overall, albeit there may be some impact visually that should be considered if located on buildings that can be viewed from above.”</p> <p>Subsequent</p>
--	--	--	---

			<p>recommendation amended on the back of this particular point also.</p> <p>6.4.4.1 strengthened to have regard to the required scheme elements (inverters, transformers, storage units etc; Amended paragraph also to ensure the relative absorptive properties of a solar panel should be considered on a case-by-case basis’.</p> <p>6.4.4.3 amended to have regard to GLVIA3 and landscape sensitivity.</p> <p>6.4.4.4 added reference to capacity.</p> <p>6.4.4.5 added footnote with reference to LI ‘assessing</p>
--	--	--	---

			<p>landscape value' and references on significance/EIA clarified.</p> <p>6,4.4.10 new footnote referencing the lack of a glint and glare study.</p> <p>Revised 6.4.4.12 in respect of vegetation and lessons learned from Appeal decisions, and how this affects grazing and restoration of the land.</p> <p>Recommendation of 6.4 add reference to 'conserve and enhance' to align with NPPF. Likewise for recommendations of 6.5</p> <p>Re-wording of 6.5.3.1 noting the sensitivity 'to the type of development proposed' ie wind</p>
--	--	--	--

			<p>etc. Capacity as well (capacity also added at 6.6.3).</p> <p>6.6.7.1 to 6.6.8.3 inclusive revised in terms of the use of the wording 'high/very high' as point scales vary depending on assessment.</p> <p>Recommendation of 7.0 - expansion on the types of benefits.</p>
Agency 2	<p>I am responding to the Consultation on behalf of ****. **** supports the recommendations in the Renewables Position Statement – Consultation Final Draft, particularly the general resumption in favour of small scale / domestic renewables schemes and the need for strict controls on larger schemes in such an environmentally sensitive area. **** primary interest is with countryside access and public rights of way. With this in mind we would like to propose the following additions and amendments to the Position Statement:</p> <p>- Section 3- Legislation, Policy and Guidance **** supports giving the greatest weighting to the Local Planning Authority Development Plan and any “made” Neighbourhood Development Plans and the Malvern Hills AONB Management Plans at the top of the decision-making hierarchy in Section 2.6. However, we would like to see a couple of general statements added to 3.1 about compliance with Highway Law; and references to the Local Transport Plan and the Rights of Way Improvement Plan to 3.2.</p>	<p>Thank you for the response.</p> <p>Regarding your comments about Section 3: The list of policies and plans in Section 3 is not exhaustive of those that should be applied to proposals for renewable energy development within the Malvern Hills National Landscape. Thus, whilst we have not referenced Highway Law, the Local Transport Plan and the Rights of Way Improvement Plan, we have also not referenced other pertinent legislation, policy, plans and guidance (Biodiversity Net Gain to name but one); yet we would of course expect proposals for renewable energy projects to demonstrate compliance with them. However, we have included reference to Highway Law and bye-laws for bridleways in Section 4.2 in response to your comments (see below)</p> <p>Regarding your comments about Section 4: 4.1.5 – Noted. Thank you.</p>	<p>Section 3: None</p> <p>Section 4.2.3: - Phrasing amended regarding screening to read <i>“screening (and softening) in the form of hedges or tree belts may be appropriate to help reduce visual effect, providing it is in keeping with the local landscape character, and does not result in the loss of key views, including from footpaths</i></p>

<p>Section 4 – Protecting the Special Qualities of the Malvern Hills National Landscape – General Considerations and Assessment Requirements</p> <p>4.1.5 - **** agrees with the proposal to prioritise the use of previously developed “brownfield” sites.</p> <p>4.2.1 – We would like to see “promoting countryside access for health and well-being” added to the list of contributing factors.</p> <p>4.2.3:- ➤ Agricultural Land - **** agrees with the presumption against using quality agricultural land for renewable energy schemes. One of our Landowner representatives has specific concerns about fuel crops and biomass if, even on a small scale, new schemes result in agricultural land being utilized. ➤ Screening - When referring to screening (and we note the sensible caveats included on this topic), it needs to be made clear that meeting the requirements of managing the view from outside does not hedge footpath and bridleway users away from the views outward, which are such an important part of the Malvern Hills experience. ➤ Materials and Infrastructure – **** supports all the individual items listed, although with regard to g) while we support the argument against putting in new site access roads, there should be an even stronger presumption against using existing public rights of way for site access. This can be a source of conflict, particularly where large vehicles threaten the safety of path users. ➤ Countryside access should be added as a new heading.</p> <p>4.4.2 - Decommissioning and site restoration often affords opportunities for new public access and recreation, including the creation of new public rights of way, which should be included in the Restoration and Reinstatement Strategy for each site.</p> <p>Section 5 – Assessment of Impacts</p> <p>5.1 – Cumulative Impacts:- When planning applications for renewable energy schemes are submitted for sites which are either crossed by or adjacent to public rights of way, compliance with Highway Law is often the last thing on an Applicant’s mind. For example, a planning application made 5 or 6 years ago for a solar farm on the other side of the county included security measures and perimeter fencing which would have made a bridleway through the</p>	<p>4.2.1 – We agree that promoting countryside access for health and well-being is an important objective for the Malvern Hills National Landscape Partnership, but we would disagree that it is – in itself – a special quality of, or contributes to, the national beauty of AONB designation. As such, this addition would not sit comfortably in this section.</p> <p>4.2.3 – Agricultural Land – noted. Thank you.</p> <p>- Screening – we note your comments and agree. The phrasing has been augmented to reflect the need to protect against the loss of views in the context of scenic beauty.</p> <p>- Materials and Infrastructure – we note your comments and agree. The phrasing has been amended to add clarity about protecting existing public rights of way.</p> <p>- Countryside Access – we note your comment and agree that accessibility to the countryside by the public is an important priority for the designated landscape partnership. It has not been added as a new heading but has been incorporated into g) access roads.</p> <p>4.4.2 - Noted and agree. Additional phrasing has been included to reflect this suggestion.</p> <p>Regarding your comments about Section 5: We agree with your view that the amenity value of footpaths and bridleways should be protected. We have included new phrasing in both Sections 4.2.3g and 5.1.5.</p> <p>We note your suggestion for a threshold for a mandatory EIA as any development over 0.5ha, however we consider that the assessments required do need to be proportionate and that the existing statements provide sufficient and appropriate guidance for this.</p>	<p><i>and bridleways crossing/in close proximity to the renewable energy project.”</i></p> <p>- New statement added to 4.2.3 Materials & additional infrastructure g) access roads: <i>“Existing public rights of way should not be used except in exceptional circumstances due to the risk to public safety. Existing access by the public to the countryside should not be lost and project proposals should consider relevant preserving the amenity value for users of footpaths and bridleways and demonstrate how this will be achieved in the construction phase and thereafter.”</i></p>
---	--	---

<p>site very difficult to use. **** would like to ensure that some of the practical considerations governed by Highway Law are adhered to when applications are assessed (eg. sticking to the minimum recommendations on path width, preserving amenity value for PRoW users, and updating the Definitive Statement if new gates or barriers are proposed). Putting my Rider Rep hat on, there are also a few specific horse access provisions in the bye-laws that apply to Castlemorton and other Common Land in the Malvern Hills National Landscape area that need a mention.</p> <p>The Landscape Value Impact Assessment (LVIA) for each application should make clear how the diminution of the amenity of existing public rights of way both in and near the site will be avoided or minimized; and preferably how the amenity will be improved.</p> <p>We would like to add the need for a specific commitment from the applicant to maintain any affected PROW after a scheme has been built, including information as to how this will be achieved (e.g. width of access for hedge flails etc).</p> <p>5.3 – Mitigation Measures:- We would like to reiterate the point made against 4.2.3 above with regard to screening – ie. where a PRoW crosses a site, the need to manage the view from outside shouldn't hedge path users in or obscure their view outward to the surrounding countryside. Most path user groups have specific guidance relating to the design of renewable schemes affecting public rights of way (eg. the British Horse Society's Guidance Notes for Wind Farm and Solar Farm Applications). It would be good to see these appropriately referenced and taken into consideration, with a commitment to consult local representatives when applications come in. As a general point, we would like to see a presumption against the temporary closure of PRoW during build and commissioning. This can be achieved in most cases with mitigation measures such as traffic lights on access roads or time restrictions on heavy vehicle movements.</p> <p>5.5 – EIA (Environmental Impact Assessment):- **** is primarily concerned with applications that impact on countryside access and rights of way. Although these tend to be</p>	<p>Regarding your comments about Section 6: We note your comments although we believe we have addressed these in our responses above and in the edits made as a consequence to other sections of the position statement.</p>	<p>- 4.4.2 Additional text included: <i>New appropriate elements in the landscape may also be considered for inclusion in the Restoration and Reinstatement Strategy, such as a wildlife corridor that could contribute to a local nature recovery strategy or new public rights of way.</i></p> <p>5.1.5. (now 5.1.4) amended to read <i>"Proposals should set out suitable assessments of effects on biodiversity, hydrology, archaeology, landscape, amenity (including of existing public rights of way) etc. and transport assessments should consider access and vehicle movements during all stages of</i></p>
--	--	---

	<p>larger schemes, there are instances where a small-scale proposal could be a concern - e.g. a single wind turbine close to a bridleway. In such an environmentally sensitive area as the Malvern Hills National Landscape we support the need for an EIA and would like to see it be made mandatory for all proposed sites of 0.5 hectares or more, with a specific requirement to consider the impact on public rights of way.</p> <p>Section 6 – Types of Renewable Energy Rather than commenting on the detail relating to each individual classification, **** would like to reiterate a few general points relating to the design of new renewables schemes that impact public rights of way – either where they cross an application site (in which case there is a legal requirement to consult path user groups) or where the site impacts on the amenity value of nearby paths (where it is discretionary). Our concerns are primarily practical ones. For example, a proposal to add new gates and barriers to a previously open footpath, noisy transformers adjacent to rights of way, proximity of large wind turbines to rights of way and common land with equestrian rights, new hedges that will encroach on a path and be difficult to maintain, a presumption against using existing rights of way as access roads, links to the National Grid which cut across public rights of way.</p>		<p><i>construction and development”.</i></p>
<p>Agency 3</p>	<p>I have quickly scanned the draft position statement and at first glance it looks sound.</p> <p>The woodland/SRC biomass section looks ok but perhaps needs a sentence adding in to cite the need for new woodlands/SRC to undergo a <u>EIA assessment for woodland</u> by the **** and therein **** to ensure that those new woodlands are <u>UK Forest Standard compliant</u>.</p> <p><i>Please Note: At the previous JAC Meeting in November, an informal comment was made by the representative of the ****, in respect of woodland ownership, such that the economies of scale required for cost-effective wood production are only occasionally achievable and that other than in Forestry Commission woodlands, rarely is there</i></p>	<p>Thank you for the response.</p> <p>We welcome the constructive input in respect of needing to add further guidance on the need for new woodlands/SRC to undergo a EIA assessment for woodland by the FC and therein FC to ensure that those new woodlands are UK Forest Standard compliant. A new proposed paragraph is suggested.</p> <p>In respect of woodland ownership, such that the economies of scale required for cost-effective wood production are only occasionally achievable and that other than in Forestry Commission woodlands, rarely is there adequate access for lorries of the size now</p>	<p>New text added to 6.2.2.1: <i>“In respect of woodland ownership, it is recognised that the economies of scale required for cost-effective wood production are only occasionally achievable and that other than in Forestry Commission</i></p>

	<p><i>adequate access for lorries of the size now commonly used for timber transportation</i></p>	<p>commonly used for timber transportation, we have added comments to this effect.</p>	<p><i>woodlands, rarely is there adequate access for lorries of the size now commonly used for timber transportation, we have added comments to this effect”.</i></p> <p>New text added to 6.2.2.2: <i>Any new woodland/SRC would need to undergo an EIA assessment for woodland by the Forestry Commission and be UK Forest Standard compliant.</i></p>
<p>Parish Council 3</p>	<p>On bio-mass at para 6.2.4 I don't think wood biomass is actually very green. Further consideration should be given to whether anything involving whole trees (versus waste wood products) should be discouraged in the AONB. I have separately sent a letter (to the Clerk) from a large group of scientists on this subject (LETTER FROM SCIENTISTS TO THE EU PARLIAMENT REGARDING FOREST BIOMASS updated January 14, 2018 - https://www.pfpi.net/wp-content/uploads/2018/04/UPDATE-800-signatures_Scientist-Letter-on-EU-Forest-Biomass.pdf). Apart from that, it doesn't look an unreasonable balance between trying to protect the area against the desire for more renewable energy production.</p>	<p>Thank you for the response.</p> <p>We noted the evidence you provided about the use of wood biomass with interest and have reflected this in some amended and new text in 6.2.4.1 with the intention of adding clarity and caution to its use. However, we have retained the recommendation that small scale wood fuel schemes may be acceptable in specific circumstances and when all the relevant considerations have been addressed.</p>	<p>New text added to 6.2.4.1 <i>“Whilst burning biomass does release CO2 emissions, CO2 is absorbed from the atmosphere during the growth of the source material and so the net lifecycle CO2 emissions are theoretically zero, although the time over which this</i></p>

			<i>"carbon debt" is repaid can be long".</i>
Local Authority 1	I am supportive of this Malvern Hills Position Statement on 'Renewable energy in the Malvern Hills National Landscape and its setting'. It is clearly set out and clearly defines the terms and types of energy generation that are considered. It gives priority to protecting the landscape, while accepting that renewable energy infrastructure is required. It is particularly useful in setting out possible effects and what to consider when assessing proposed developments. As this draft has been published prior to the **** draft Local Plan, it will be interesting to see how the two reflect each other on renewable energy policies.	Thank you for the response. The response does not require amendments to the draft Position Statement to be made.	None.
Local Authority 2	Thank you for consulting **** on this matter. At this time, there are no officer comments to make.	Thank you for the response. The response does not require amendments to the draft Position Statement to be made.	None.
Local Authority 3	We are encouraged to see the adoption of a renewable energy position statement by the Malvern Hills Natural Landscape. Below are comments from the **** on the main types of renewable energy as highlighted in the position statement. Heat Pumps · We support the Malvern Hills National Landscape Partnership support of the use of heat pumps, in particularly air source heat pumps. · Air-source heat pumps will provide high-grade heat which are integrated with existing buildings. Unlike, ground-source heat pumps there will not need to be extensive excavation work required to install the pumps, considering the natural beauty, distinctive character, and rich biodiversity of the Malvern Hills this disruption should be avoided. · Any concerns regarding the noise of the air source heat pump can be easily mitigated by carefully selecting the manufacturer. It should be considered that current and future technological developments suggest that air source heat pumps are being manufactured both smaller and quieter.	Thank you for the response. Regarding your comments on heat pumps: noted. Regarding your comments on biomass: - CHP: noted - domestic woodburning: we agree. Our use of "not encouraged" rather than "discouraged" was intentional as we recognise domestic woodburning is acceptable and appropriate in some circumstances. - energy crops: we concur about the importance of food production; this is already included therefore in 3.2.4.6. - AD plants: we agree that larger plants could potentially inject gas into the grid however the position statement makes it clear that such larger plants are unlikely to be suitable and supported and therefore no amendments to the text are proposed for this. Regarding your comments on hydropower:	Recommendation in Section 6.3 amended to read: <i>o Ensure aquatic life is not detrimentally affected;</i> 6.7.3 and 6.7.4 amended to include reference to battery use in domestic settings. 6.4.3.2 amended to read: <i>"PV panels mounted on buildings are considered more suitable than those that are</i>

	<ul style="list-style-type: none"> · The use of a split system air source heat pump could mitigate the detrimental visual impact of the makeup and character of a building. The split system means that the main unit of the air source heat pump could be placed within a garden and hidden rather than being placed externally on/outside a building. · Whilst air source heat pumps are a low maintenance and energy efficient way to heat buildings and do not rely on gas and oil boilers, they still require electricity to run. It should be considered to use air source heat pumps in combination with other renewal energy generation methods such as the installation of solar panels, this will assist in significantly reducing carbon emissions. <p>Biomass</p> <p>We agree the use of large-scale biomass plants >10MW would be inappropriate for the local setting of the Malvern Hills National Landscape.</p> <ul style="list-style-type: none"> · A CHP plant that is well designed and operated will always improve energy efficiency and significantly reduce CO2 emissions. The actual benefits in terms of emissions reductions will depend on specific characteristics and operating conditions of a plant. · In regard to the ‘use of domestic woodburning stoves should not be encouraged due to potential impacts on air quality’. Whilst discouraging the use of stoves in domestic settings, the use of domestic settings the use of domestic stoves should be recognised as a legitimate heat source for a number of primarily older properties that are not able to benefit from other forms of heating. · Whilst small scale fuel crop planting at local level will offer superior GHG balance to the energy crop market, care should be taken not to impinge on availability for food production. · Dependent on the scale of an AD plant, it should be recognised that there is also potential to inject into the gas grid as a form of renewable energy. · 6.2.5.3, we suggest specifying what ‘locally sourced’ is geographically (e.g., X number of miles, or location such as Malvern, Worcestershire or wider) to minimise the transportation of feedstock.) 	<p>We agree with your suggested change and the statement has been amended.</p> <p>Regarding your comments about solar energy:</p> <ul style="list-style-type: none"> - We note your comment about the fabric of buildings and insulation. This is outside of the scope if this position statement but will be a consideration when reviewing our guidance and policy documents. - we note your comment about the use of batteries in domestic setting and agree. The text has been amended. - we note your comments about the positioning of solar panels and agree. We have amended the text in 6.4.3.2. and 6.4.3.9 <p>Regarding your comments about wind energy:</p> <p>We note your support for our guidance on this. We also note your comments about emerging technologies that may make larger scale projects more acceptable. We will be monitoring emerging evidence and use that to inform future reviews of this position statement.</p>	<p><i>freestanding as they are likely to have fewer adverse effects, albeit there may be some effects visually that should be considered if located on buildings that can be viewed from above. In a few specific circumstances, ground mounted solar panels therefore may be more preferable, but this should be clearly justified. Ideally, PV panels can be used as a building material, integrated into the roof (or facades) of buildings e.g. using solar shingles, solar slates, solar glass laminates and other solar design solutions, and can be integrated with traditional tiles/slates although it is acknowledged that this may not be</i></p>
--	---	--	--

<p>· The recommendation around integrating any AD installation should also apply to any of the other renewable energy generation schemes (apart from second point).</p> <p>Hydropower We suggest replacement of ‘river life’ to aquatic life’.</p> <p>Solar Energy</p> <ul style="list-style-type: none"> · The document refers to the energy hierarchy. Is there or will there be a further position statement considering the need to improve the fabric of the buildings? For properties that are a solid wall construction that may include a recommendation for external wall insulation, considerable government funding is being directed towards decarbonising the domestic sector. · The use of battery storage to support solar generation is of increasing importance. In the recent Worcestershire Solar Together scheme 91% of households installed battery storage along with their solar PV installation. The document references the use of existing farm buildings for the storage of an inverter. It is recommended that consideration of battery storage for domestic properties is also included in this document. · We agree that solar technology should be introduced as a mandatory part of building regulations for new build properties. · We support the prioritisation of roof mounted solar PV. It is important to note that panels recessed into the roof are likely to be more expensive for homeowners and may exclude some residents from accessing renewable energy for their home. An inability to affordably heat a home can result in underheating which can have a detrimental to the impact of the structure. · The position statement may also wish to address the use of nesting bird protection to prevent birds from nesting underneath the panels. This could be in the form of wire netting or solar ‘skirts’. <p>Wind Energy</p> <ul style="list-style-type: none"> · We support the Malvern Hills Landscape Partnership’s stance to support the use of small-scale stand-alone wind turbines within the curtilage of houses or blocks of flats. 		<p><i>viable for householder scale upgrades on existing buildings”.</i></p> <p>Additional text added to 6.4.3.9 : <i>The impact on wildlife which may roost, nest or travel under the panels should be considered to ensure suitable measures are taken to protect them.</i></p>
--	--	--

	<p>· Whilst we encourage the use of all methods of renewable energy generation, we understand the Malvern Hills National Landscape Partnership's stance not to support large-scale wind energy schemes within Malvern Hills National Landscape due to the scenic beauty of the landscape.</p> <p>· Whilst we understand the stance not to support large-scale wind generation, we would encourage the partnership to bear in mind future technology regarding wind generation, such as bladeless wind energy generation methods which differs to the standard turbine design. The adoption of this new technology, which is currently in the development stage in the UK, could (if designed and adapted carefully) be integrated into the National Landscape without having a detrimental impact on the landscape or its surrounding area.</p>		
Agency 4	<p>Thank you for consulting **** on the above document. As the Government's adviser on the historic environment, **** is keen to ensure that the conservation and enhancement of the historic environment is fully considered at all stages and levels of the local planning process.</p> <p>We understand that the purpose of this Position Statement is to provide guidance on generating energy from renewable sources within the Malvern Hills National Landscape; expanding on relevant policies in the current Malvern Hills AONB Management Plan. However, it is important to ensure that the implications of this position statement do not adversely affect or undermine the historic, physical and social value of the historic environment.</p> <p>**** recognises the urgent need for positive action in response to the climate crisis and is committed to achieving net zero carbon emissions. Therefore, we are fully supportive of the Malvern Hills National Landscape Partnership's (MHNLPP) commitment to addressing the challenges of climate change in the Malvern Hills National Landscape and its setting, whilst conserving and enhancing the natural beauty of the protected landscape.</p> <p>Please follow the link below for **** response to the climate, energy and biodiversity crisis, which may be of interest: https://historicengland.org.uk/advice/climate-change/our-strategy/</p>	<p>Thank you for the response.</p> <p>We note your comments about Section 4. Your suggestions regarding LVIAs and archaeological assessments are helpful and have been reflected in some updated text in the position statement.</p> <p>We note your comments about Section 5 and agree with the suggestions to ensure the historic environment is specifically mentioned. Text in 5.1.5 and 5.3.1 has been amended.</p> <p>We note your comments about Section 6: Thank you for your endorsement of Sections 6.1 and 6.2 and 6.4. We agree with your suggestions for 6.2.5 and 6.4.1.2 and for reference to the historic environment in the recommendation regarding large scale solar projects and have amended the text accordingly.</p> <p>We agree and have amended heritage features to read heritage assets in 6.5.4.4 but have not included reference to historic environment in the recommendation for either small-scale or large-scale wind energy as we consider this to be encompassed</p>	<p>4.2.3 has had additional text added under Zone of Visual Impact (now titled Assessments):</p> <p><i>designated heritage assets should be considered as individual visual receptors within an LVIA/LVA and should be considered when selecting viewpoints.</i></p> <p>Additional text added to 4.3.3: <i>An assessment of the potential for decommissioning stage effects, such as harm due to</i></p>

<p>We also refer you to **** recent consultation on its draft Climate Change advice note, which we hope will be of assistance: https://historicengland.org.uk/content/docs/guidance/climate-change-historic-buildingadaptation-consultation-draft/</p> <p>In relation to this draft Position Statement we have the following specific comments:</p> <p>Section 4: PROTECTING THE SPECIAL QUALITIES OF THE MALVERN HILLS NATIONAL LANDSCAPE – GENERAL CONSIDERATIONS AND ASSESSMENT REQUIREMENTS</p> <p>4.1 Landscape Character</p> <p>**** supports the requirement that landscape assessments for renewable energy project proposals should refer to the County Wide Historic Landscape Characterisation and that they should demonstrate how the proposal responds to the existing landscape pattern and landform.</p> <p>4.2 Other factors that contribute to natural beauty</p> <p>We are pleased to see that the historic environment is referenced as being included within ‘Cultural heritage’, as a factor that contributes to the natural beauty of the AONB/National Landscape designation. With regard to issues concerning visual effects and tranquillity, we endorse the requirement for Landscape and Visual Impact Assessments (LVIAs) to be employed at the pre-application stage of renewable energy development. We also recommend that any assessment of impacts should ensure that designated heritage assets are considered as individual visual receptors within an LVIA and should be taken into account when selecting viewpoints.</p> <p>4.3 Manufacturing and Decommissioning</p> <p>**** considers that the decommissioning stage of some renewable energy installations, especially wind turbines and solar farms, may have the potential to harm buried archaeological assets. Therefore, we consider that an assessment of the potential for decommissioning stage effects, such as harm due to the removal of piles and deep ploughing, should be made at the pre-application stage and that consideration should be given to the requirement for an outline Decommissioning Environmental Management Plan</p>	<p>in the considerations sections for each that would need to have been addressed.</p> <p>Regarding Section 6.7:</p> <p>We note your comment and agree that heritage assets should be considered. This has been included now in the text. Reference to the historic environment has not been included however in the recommendation for the section as we consider this to be encompassed in the reference to the considerations that would need to have been addressed.</p>	<p><i>archaeological features/assets due to the removal of piles and deep ploughing, should be made at the pre-application stage and consideration should be given to the requirement for an outline Decommissioning Environmental Management Plan (DEMP) to be submitted within a planning application documentation for renewable energy development, or a DEMP to be secured via a condition of planning permission, where relevant.</i></p> <p>Additional text added to 5.3.1 and 5.1.5 (now 5.1.4) to reference built heritage assets and the historic environment.</p>
--	--	--

	<p>(DEMP) to be submitted within planning application documentation for renewable energy development, or a DEMP to be secured via a condition of planning permission, where relevant.</p> <p>Section 5: ASSESSMENT OF IMPACTS</p> <p>5.1 Cumulative Impacts</p> <p>Whilst **** notes that paragraph 5.1.5 requires that proposals should set out suitable assessments of impacts on archaeology, we suggest that built heritage and historic landscape should also be specifically referenced with regard to the assessment of cumulative impacts.</p> <p>5.3 Mitigation Measures</p> <p>**** considers that this section on ‘Mitigation Measures’ should also encompass consideration of the historic environment, where relevant, for renewable energy schemes.</p> <p>Section 6: TYPES OF RENEWABLE ENERGY</p> <p>6.1 Heat Pumps</p> <p>**** notes that para. 6.1.2 states that “historic landscapes should, wherever possible, be avoided”. We are pleased to see reference to addressing impacts on historic landscapes and archaeology within the ‘Recommendations’ and refer you to sections 103 and 104 of our draft Climate Change advice note (please see link above) for our latest guidance on heat pumps.</p> <p>6.2 Biomass</p> <p>6.2.3 Fuel Crops - We are pleased to see the inclusion of historic landscapes, within the requirement of the assessment of impacts on landscape character, where fuel crops are being introduced (para.6.2.3.3).</p> <p>6.2.5 Wet Biomass – Anaerobic Digesters (AD) - **** welcomes that the ‘Recommendations’ for wet biomass include that installations should not affect the historical value of designated industrial features, historic monuments and archaeological sites and remains, and also should not adversely affect the character and appearance of any Conservation Areas and Listed Buildings.</p> <p>However, we suggest that the wording ‘historical value’ be amended to ‘significance’, to ensure greater consistency with the NPPF, as the value of a heritage asset can be derived from the archaeological,</p>		<p>Amendments to 6.2.5 recommendations, changing <i>value</i> to read <i>significance</i>, and <i>a strong historic character</i> replaced with <i>historic landscapes</i>.</p> <p>Text in two bullet points in 6.4.1.2 amended to read:</p> <ul style="list-style-type: none"> • <i>Avoid adversely affecting areas of semi-natural habitat and designated and non designated historic assets and archaeological sites directly or indirectly.</i> • <i>Protect the character and setting of Conservation Areas and elements, as well as buildings, which contribute to their special architectural or historic interest.</i>
--	---	--	--

<p>architectural or artistic value of the asset, as well as its historical value and also from its setting.</p> <p>With reference to the last bullet point of the ‘Recommendations’ for wet biomass, we welcome that large new AD buildings and structures are unlikely to be supported within the Malvern Hills National Landscape and in areas of ‘a strong historic character’. However, whilst we support the sentiment of this recommendation, **** suggests that the wording be changed to refer to ‘historic landscapes.’</p> <p>6.4 Solar Energy</p> <p>6.4.1 Solar Energy – general information - **** is pleased to see that the checklist of further issues to be considered for solar energy proposals includes the avoidance of adverse effects on designated historic and archaeological sites and also protecting the character and setting of buildings with Conservation Areas.</p> <p>However, it is the case that solar energy development may also have adverse impacts on non-designated heritage assets and that Conservation Areas may also contain elements, as well as buildings, which contribute to their special architectural or historic interest. We would therefore suggest that the wording of the checklist is amended to reflect the above.</p> <p>We would also refer you to ****’s Advice Note 15: Commercial Renewable Energy Development and the Historic Environment, which may be of assistance: https://historicengland.org.uk/images-books/publications/commercial-renewableenergy-development-historic-environment-advice-note-15/heag302-commercialrenewable-energy-development-historic-environment/</p> <p>6.4.3 Micro and Small-scale solar – relevant considerations – **** welcomes the reference to location, siting and design being important considerations for schemes that relate to Listed Buildings, Conservation Areas and other heritage assets.</p> <p>As the document notes, solar panels may have a significant impact on the landscape, and therefore may also have a knock-on impact to the views and experience of heritage assets. For solar photovoltaic and solar thermal panels to be efficient they must be placed in an area with high exposure to sunlight, meaning that these features are</p>		<p>The recommendation in Section 6.4.4 regarding large scale solar projects now refers to the protection of the historic environment, with reference to conserving and enhancing.</p> <p>Text added to 6.7.4• <i>Potential impacts on heritage assets and the historic environment</i></p>
---	--	--

likely to be highly visible in the landscape, and may be in open spaces that may provide key or protected views to and from assets.

Considering the historic environment when implementing solar photovoltaic and solar thermal panels will ensure that the views and setting of heritage assets are preserved, alongside the assets themselves.

For our latest advice on the installation of photovoltaic and solar thermal panels we refer you to ****'s draft Climate Change advice note (please see link above).

6.4.4 Large-scale solar energy – **** agrees with para.6.4.4.3 that landscape sensitivity is an important consideration for large-scale solar energy developments, and we also advocate that local planning authorities should undertake a Landscape Sensitivity Assessment (LSA) for wind and solar energy, as part of their evidence base for development plans, as per para. 6.4.4.4 of this Position Statement.

We further concur that consideration of cumulative effects should be a requirement of each proposal of this type of renewables. However, we would suggest that reference to an assessment of potential effects on the historic environment should also be included within the 'Recommendations' for large-scale solar energy development.

6.5 Wind Energy

6.5.4 Small-scale wind energy – siting and design – **** welcomes the reference to consideration of impacts on the historic environment and cultural/heritage features and their settings in para.6.5.4.4 but suggests that 'heritage features' is amended to refer to 'heritage assets', to better reflect the wording of the NPPF and that the 'Recommendations' for small-scale wind energy should specifically include reference to the historic environment.

6.5.5 Large-scale wind energy – Whilst **** welcomes the reference to the need for the consideration of the effect of wind development upon historic assets near the development and the wider landscape context in para. 6.5.5.8, we suggest that the 'Recommendations' for large-scale wind energy should specifically include reference to the historic environment.

	<p>6.6. Wind and Solar Energy – Identification of ‘Suitable Areas’ **** is supportive of the identification of ‘suitable areas’ for wind and solar energy in local authority development plans being underpinned by a Landscape Sensitivity Assessment and by consideration of relevant constraints, which are stated as including historic environment designations (para.6.6.6). However, we consider that reference should also be made to non-designated heritage assets in such constraints, and that local planning authorities should seek advice from their chosen specialist archaeological adviser on this issue. We would also advise early engagement by local planning authorities with **** in relation to the methodology for the identification of suitable areas for wind and solar energy.</p> <p>6.7. Energy Storage **** suggests that the historic environment should be included within the ‘relevant considerations’ relating to energy storage, both within the text at para. 6.7.4 and within the ‘Recommendation’.</p> <p>In addition to the above, **** notes that references to paragraph numbers in the NPPF need updating in some instances e.g. references to NPPF paragraph 177 in sections 6.6.8.1 and 6.6.8.3 of the Position Statement should be changed to refer to NPPF paragraph 183.</p> <p>**** would be happy to provide further comments as the Renewable Energy Position Statement is progressed over the coming months. We would like to stress that the above opinion is based on the information provided by the MHNLP in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation, or in later versions of the Position statement), where we consider that these would have an adverse impact upon the historic environment.</p> <p>We hope that the above comments will assist.</p>		
Member of Public 3	<p>I have read the Draft Position Statement 4 - Renewable Energy document V2 dated December 2023. I would wish to make the following comments / suggestions for inclusion.</p> <p>1.4 (add at the end of the paragraph) “However it should be noted that in National Landscape (AONB) planning terms renewable energy</p>	<p>Thank you for the consultation response.</p> <p>We note your suggestion for 1.4. We accept and hope that the UK energy industry will eventually become zero carbon in the future. However it is incumbent on us all to be integral to and contribute to this change</p>	<p>6.4.4.10 to read as: “...Similarly, the effect of the siting of solar panels, particularly in terms of their</p>

<p>is not a “trump card”. It may be expected that the National Grid (ESO) will be fully decarbonised within the next 10 years and an increasing contribution from reliable zero carbon nuclear power and other (net zero carbon) forms of power generation will increasingly obviate any need for contributions from intermittent and unreliable onshore wind and large utility scale solar power generation, across the United Kingdom.”</p> <p>6.4.4.10 current version quote, add words in italics “Similarly, the impact of the siting of solar panels, particularly in terms of their reflectivity of both sunlight and moonlight, should be considered in relation to views from the Malvern Hills and the impacts that may have on such users, as well as views from PROWs and from residential areas.”</p> <p>6.4.4.11 at the end of the paragraph add “For all the above reasons any large scale utility solar development above 10 hectares (25 acres) in area within 5 kilometres and 15 hectares (37 acres) in area within 10 kilometres of the boundary of the Malvern Hills National Landscape (AONB) will be robustly resisted.”</p> <p>6.4.4.13 current version quote “The Feed in Tariff for solar PV applies for a period of 25 years therefore developments should normally be regarded as temporary, hence the need for ‘reversibility’, and the ability for all structures to be removed and the land returned to its original use.” This is misleading ... most utility scale solar is no governed by the “contracts for difference” UK Gov DESNZ bidding rounds. Most Planning Applications are considered “permanent” (particularly National Grid (ESO) substations) and run for 40 – 45 years well beyond any likely “green-house gas” (GHG) emissions saving as total zero carbon in the UK will have long been achieved. I therefore suggest a new paragraph start “Large scale utility solar developments may be considered permanent features in the National Landscape (AONB) for the large majority of local residents and visitors who come to enjoy the setting of the Malvern Hills. The “reversibility” of these features and the ability for all structures to be removed and the land returned to its original use will be extremely difficult to manage in the future and above all to ensure that the</p>	<p>where possible to do so. As such we have developed this position statement to provide a balance as to what can be done without harming the special qualities of the Malvern Hills National Landscape and its setting.</p> <p>We note your comment on 6.4.4.10 and have amended the wording to include reference to moonlight and sunlight.</p> <p>We note your comment on 6.4.4.11. We believe that specification of locations and sizes of projects is not appropriate but that the guidance and specific considerations provided in this section, and our resultant recommendations regarding micro-. Small- and large- scale solar development provides sufficient information for landowners, developers and planners in their decision making.</p> <p>We note your comment on 6.4.4.13 and consider that the position statement could have more clarity about the length of time solar developments could operate and the potential complications with reversibility. Some additional clarifying text has been added to 6.4.4.13.</p>	<p>reflectivity of both sunlight and moonlight, should be considered in relation to views to and from the Malvern Hills and the impacts that may have on such users, as well as views from PROWs and from residential properties.</p> <p>New text added to 6.4.4.10 <i>“of both sunlight and moonlight”</i></p> <p>New text added to 6.4.4.13 (as footnote??): <i>Although it is argued that large scale ground-mounted solar developments are temporary and reversible, there is no precedent to by which to judge this as no UK solar sites have yet been subject to restoration and agricultural reversion. In</i></p>
--	---	---

	appropriate parties can be held fully legally responsible and that it can be it can be adequately financed”.		<i>practice, solar developments are, or can become, more permanent features. Many are planned to operate for 40 years, and/or they extend their operating licence, and the practicality of the effective implementation of a restoration strategy after such an extended period of time is unknown.</i>
Member of Public 4	I would like to strengthen references to the setting of the AONB (Section 5.4). Much of the Malvern Hills’ attraction is the views from the area, and particularly the views towards Wales from the top of the hills. The latter has few, if any, discernible industrial features and as such the addition of wind turbines and / or large scale solar would have a material adverse impact on these views and the enjoyment of the AONB by those who live in and / or use the area for recreation. In a similar vein, persons outside of the AONB are drawn to it partly by the fabulous views towards the AONB from a myriad of footpaths and roads in the surrounding area. Blocking of such views from the imposition of large scale solar, or distraction through the movement of wind turbines would reduce the amenity value of the AONB for receptors and also degrade the landscape setting in which the AONB is located.	<p>Thank you for your consultation response.</p> <p>We note your comments on section 5.4. We believe we have appropriately covered the importance of the setting of the AONB in this section and in specific references throughout the position statement to the setting, including views to the Malvern Hills from it as well as views from the Malvern Hills towards its setting, and the importance of key viewpoints. We also would draw attention to our separate Position Statement on Development and Land Use Change in the Setting of the Malvern Hills National Landscape.</p> <p>The response does not require amendments to the draft Position Statement to be made.</p>	None.
Local Authority 4	Thank you for the opportunity to comment on the Renewable Energy in the Malvern Hills National Landscape and its Setting Position Statement (hereafter referred to as the Position Statement). This is an officer response on behalf of the ****.	<p>Thank you for your response.</p> <p>The response does not require amendments to the draft Position Statement to be made.</p>	None.

<p>Local planning authorities are bound by the legal duty in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that, taken as a whole, planning policy contributes to the mitigation of and adaptation to climate change. This outcome-focused duty on local planning clearly signals the priority to be given to climate change in plan-making.</p> <p>Chapter 14 of the NPPF concerns meeting the challenge of climate change, flooding and coastal change. It points out that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure.</p> <p>Local Planning Authorities should adopt proactive strategies to mitigate against and adapt to climate change and support the move to a low carbon future by planning for development in locations to reduce greenhouse gas emissions, and to support energy efficiency improvements.</p> <p>As background, the South Worcestershire Development Plan (SWDP), covering the administrative areas of Malvern Hills, Worcester City and Wychavon, was adopted in February 2016. The SWDP allocates land for housing, employment and other land uses and guides infrastructure provision. Relevant policies within the SWDP include SWDP1 (Overarching Sustainable Development Principles), SWDP 23 (The Cotswolds and Malvern Hills Areas of Outstanding Natural Beauty (AONB)) and SWDP27 (Renewable and Low Carbon Energy).</p> <p>The **** are currently reviewing the SWDP and submitted the SWDP Review (SWDPR) to the Planning Inspectorate on the 27th September 2023.</p> <p>The **** are committed to addressing climate change within the SWDPR. The way in which planning policy can shape new and existing communities can make a significant contribution to tackling climate change, both by reducing carbon emissions and by building resilience</p>		
--	--	--

to its impacts, including Renewable and Low Carbon Energy (RLCE) generation and storage.

Relevant SWDPR Policies

SWDPR01: Climate Change

This strategic policy prioritises minimising carbon emissions and the impacts and consequences of climate change in a holistic manner including the use of energy and the generation of energy which mitigates against and adapts to Climate Change.

SWDPR 28: The Cotswolds National Landscape (NL) and Malvern Hills Area of Outstanding Natural Beauty (AONB)

This policy seeks to ensure development proposals within the NL / AONB and their settings conserve and enhance the natural beauty and special qualities of the NL and AONB. The policy also notes that proposals should have regard to and be consistent with the relevant guidance published by the Cotswolds Conservation Board and Malvern Hills AONB Partnership.

It is also noted that an update to this policy, and the SWDPR in general, will be made in reference to the change in name from the Malvern Hills AONB to the Malvern Hills National Landscape.

SWDPR 33: Renewable and Low Carbon Energy

This policy provides support for stand alone and low carbon energy schemes, as well as requiring any new development over 100sqm gross or one or more dwelling to incorporate the generation of energy from renewable or low carbon sources equivalent to at least 20% of predicted energy requirements. Further guidance is set out in the South Worcestershire Renewable and Low Carbon Energy SPD (July 2018).

SWDPR59: Renewable and Low Carbon Energy Allocations

Policy SWDPR 59 of the SWDPR proposes nine allocations for large-scale ground-mounted solar photovoltaic farms, if the impacts are (or

can be made) acceptable. Four of these allocations are located within Malvern Hills District Council (Table 1).

Table 1: SWDPR 59 RLCE Allocations proposed within Malvern Hills District				
Reg 19 Reference	CFS Reference	Site	Size (ha)	Proximity to AONB / NL (km)
SF06	RLCE012sc	Land at Queenhill	13.6	6.5
SF07	RLCE033b	Ryall House Farm, Ryall	12.5	6.7
SF08	RLCE055c	Land at Whiting Ash Farm, Berrow	9.1	1.04
SF09	RLCE056c	Land at Pendock	11.5	2.3

Essential criteria when assessing the suitability of the Renewable and Low Carbon Energy sites also included an assessment of whether the sites were likely to have a significant adverse impact on an AONB (now rebranded as National Landscapes) or its setting.

A Landscape and Visual Impact Assessment must be submitted with all planning applications for solar power schemes to assess the likely landscape and visual impacts of the proposal. This should be prepared in accordance with the Guidelines for Landscape and Visual Impact Assessment, 3rd. Edition, April 2013 (Landscape Institute and Institute of Environmental Management and Assessment). Furthermore, the Reasoned Justification for SWDPR39 sets out at

	<p>9.22 that solar farm developments in an AONB or its setting, where there could be adverse impacts on the protected area, would need careful consideration. AONB management plans, landscape character assessments and position statements must be considered in planning stages to help inform development, and early consultation with AONB planning officers should be sought.</p> <p>**** Comments on the Renewable Energy in the Malvern Hills National Landscape and its Setting Position Statement</p> <p>The **** have no in principle objections to the Position Statement and support its aims of ensuring RLCE development within the National Landscape and its setting is managed effectively and impacts are minimized.</p> <p>The **** consider the Position Statement to support the principles of national planning policy and there is no conflict with the adopted SWDP or emerging SWDPR policies on renewable and low carbon energy provision.</p> <p>Naturally, if further changes are made to the contents of the Position Statement, then we request an opportunity to make representations.</p> <p>We acknowledge and appreciate that the Malvern Hills National Landscape Partnership has engaged constructively with the ****. Further, the **** are committed to further discussions as both the Position Statement and SWDPR progress to comply with on-going requirements associated with the Statement of Common Ground between the **** and the Partnership.</p>		
Local Authority 5	<p>Overall, I am fully supportive of the measures to assess and protect landscape character set out in the document.</p> <p>4.1.2: I welcome the reference to Historic Landscape Character as this is an evidence base that both complements and adds an additional, fine-grained layer of character and time-depth to LCA. Both data sets will be key to informing assessments of specific landscape significance, sensitivity, capacity and setting.</p>	<p>Thank you for the response.</p> <p>A minor change has been included in the text for 4.4 to reflect your suggestion for the need to engage with LPA officers and Malvern Hills National Landscape officers and to specifically mention BNG objectives. Additional text also clarifies the opportunity for appropriate enhancements in a restoration plan.</p>	<p>Section 4.4.2 amended to read: A site Restoration and Reinstatement Strategy in the form of a legal agreement should be sought and agreed with LPA Officers, in</p>

	<p>4.2.1: Again, an important consideration is the relationship between these factors. It is an unfortunate established practice that most LVA/LVIAs and Heritage Statements do not integrate more fully, given that the landscape is not an abstract entity, but a complex ecosystem and record of related functions and processes. To fully understand significance and sensitivity, it must be assessed through integrated methods.</p> <p>4.4: Restoring the site: I agree this should be key requirement of the permission, as it would be with a Minerals and Waste scheme. Therefore, a restoration plan and management plan that provides details of specific measures linked to BNG objectives and landscape character enhancements that nonetheless accord with the baseline character, should be agreed with Malvern Hills National Landscape and LPA Officers, at pre-application stage, and then secured by condition with a monitoring clause.</p> <p>Having reviewed the suite of recommendations set out in context throughout the document, I support the recommendations and measures proposed. These are comprehensive and, I believe, strike a good balance between supporting the delivery of renewable energy schemes whilst protecting the special qualities of the National landscape. The prioritisation of brownfield land, as proposed, will provide a clear steer, however, the success will focus on detailed assessment, that should inform detailed design and restoration.</p>		<p>consultation with the Malvern Hills National Landscape Team, at pre-application stage, and thence secured by condition, if planning permission is granted, with a monitoring clause to ensure restoration of any relevant land to agricultural (or other) usage once the consent or use has terminated and a condition imposed that all equipment associated with the development is removed. The agreement should demonstrate how and when the site will be returned to a state that is in good landscape and ecological condition and in keeping with local landscape character and Biodiversity Net Gain obligations.</p>
--	--	--	---

			<p>New appropriate elements in the landscape may also be considered for inclusion in the Restoration and Reinstatement Strategy, such as a wildlife corridor that could contribute to a local nature recovery strategy or new public rights of way.</p>
<p>Agency 5</p>	<p>The **** welcomes the opportunity to comment on Malvern Hills National Landscape – renewable energy. The **** would urge planning authorities to consider the potential impact they could have on rural economies, climate change, food security, providing affordable homes and getting essential rural infrastructure in place. At a time when we have challenging trading conditions, world unease and a growing population it is essential that this strategy, alongside the planning system can support farming and rural communities to move to a more environmental farming friendly sustainable future.</p> <p>In relation to point 4.2.3 – farmers and landowners should not be restricted to micro or small scale renewable developments if they are sited sensitively with the correct impacts assessments undertaken.</p> <p>Utilising roofs and farm buildings for solar should also be incentivised as it delivers a sustainable method of energy production while avoiding any land use conflict. However, ground-mounted solar must be recognised by local authorities as another way of helping farming business become more sustainable and viable.</p>	<p>Thank you for the response.</p> <p>We note your comments about the scale of developments that are being recommended in the position statement. The position statement is intended to provide a balance between the obligation to protect, conserve and enhance the protected landscape and the recognised climate emergency and the economic needs of the community living within the Malvern Hills National Landscape and its setting – including its valued farming community.</p> <p>We accept that 4.2.3 suggests only micro and small scale renewable projects would be considered acceptable, but section 6 provides detail on the range of renewable energy projects that could be considered appropriate, and the relevant considerations associated with these.</p> <p>The position statement endorses your comments that farm buildings offer an opportunity for solar energy generation. The recommendations in 6.4 call for greater opportunities via LPA policy and decision</p>	<p>Text added to 6.5.2.2 and the recommendation in Section 6.5.4 “<i>farm and office buildings</i>”.</p>

<p>Farmers and growers are already generating clean energy and helping meet renewable energy ambitions, alongside their traditional role in food production and delivery of other environmental and land management services. Generating energy can work alongside food production, but farmers' inability to secure grid connections and planning permission means they are limited in what they can do. Farmers own or host about 70% of the UK's total solar generation capacity, whether on rooftops of agricultural buildings or in solar farms. Solar remains the most popular form of renewable energy generation in British agriculture, with at least 20,000 agricultural rooftop installations and about 1,300 ground-mounted solar farms. The current UK land area used for solar farms is no more than 20,000 hectares. With most installations having only a modest visual impact, solar PV is regarded by many experts as one of the most environmentally benign renewable energy technologies. Agricultural buildings are ideal platforms to host solar panels. Solar modules on roofs blend in with the image of a working farm.</p> <p>On-farm wind power is a vital complementary element of year-round independent on farm electricity generation, alongside rooftop solar. But the burden of full planning application, and poor prospects of approval under current planning policy, means that only a handful of on-farm wind turbines have been installed in the past eight years.</p> <p>The **** backs calls for a revision of permitted development rights on planning for small-scale onsite wind generation, where the electricity generated is principally being used directly by farmers or other small-to-medium sized enterprises.</p> <p>Producing land-based renewable energy, for on-farm use or to supply others, displaces greenhouse gas (GHG) emissions and is an important part of the **** net zero ambition. In the longer term, boosting renewable energy and the bioeconomy could deliver substantial estimated GHG savings and GHG removals of up to 26 MtCO₂e/year. The **** aspiration is for every farmer and grower to</p>	<p>making, for roof mounted solar energy generation and for mandatory installation of PV on new build. This would include farm buildings.</p> <p>The position statement does not preclude ground mounted solar energy generation, but it provides clear guidance on the conditions in which this would be considered acceptable.</p> <p>The position statement supports your desire for small-scale onsite wind generation, where the electricity generated is principally being used directly by farmers or other small-to-medium sized enterprises. We have amended 6.5.2.2. and the associated Recommendation to provide clarity that wind energy generation could be acceptable (with certain considerations being met) in the curtilages of farm and office buildings as well as houses and blocks of flats as this was not explicit in the consultation draft.</p>	
--	--	--

	have the opportunity to become a net exporter of low-carbon energy. Even if UK agriculture’s solar generation capacity increases five-fold by 2035, as envisaged in the government’s Energy Security Strategy, the land under solar farms would only increase to 0.5% of the total agricultural area, complementing food production rather than competing with it.		
--	--	--	--

Throughout the document, the National Landscape Team have also made alterations to numerous paragraphs in the interests of ease of reading and grammar/spelling.

A tracked changes version of the Position Statement is available on request from either the Malvern Hills National Landscape Partnership Manager or the Malvern Hills National Landscape Team Planning Officer.

Document ENDS.