

# **MALVERN HILLS NATIONAL LANDSCAPE JOINT ADVISORY COMMITTEE**

**26 APRIL 2024**

## **PLANNING POSITION STATEMENTS – POSITION STATEMENT 4: RENEWABLE ENERGY IN THE MALVERN HILLS NATIONAL LANDSCAPE AND ITS SETTING**

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### **Recommendation**

- 1. The Committee is recommended to:**
  - a) Note the consultation undertaken by the Malvern Hills National Landscape Team on the 'Renewable Energy in the Malvern Hills National Landscape and its Setting' Position Statement, which took place between 19 December 2023 and 28 February 2024, and noting subsequent changes made by Malvern Hills National Landscape Team following consultation feedback;**
  - b) Endorse the 'Renewable Energy in the Malvern Hills National Landscape and its Setting' Position Statement.**

### **Background**

- 2. Position statements intend to establish the position of the Malvern Hills National Landscape Partnership on key issues affecting the area, helping guide the Partnership and relevant plan-making and decision-making bodies to articulate how the Area of Outstanding Natural Beauty (AONB) designation can be conserved and enhanced. They also seek to help to deliver the objectives and policies contained within the current Malvern Hills AONB Management Plan, itself a statutory plan and a material planning consideration.**
- 3. Position statements are stand-alone documents, framed largely in terms of recommendations, and providing some brief context explaining why the Partnership is taking this position. They provide further context, guidance, and recommendations in relation to specific Management Plan policies and associated issues. They do not create new policies and sit alongside the already widely published guidance by the Partnership. Position statements are referred to, where appropriate, in representations submitted by the National Landscape Team on planning consultations.**
- 4. The Partnership currently has three planning position statements, this being on Setting, Housing and Landscape-led Development, which have been endorsed by the Committee.**

5. At the November 2023 meeting of the Committee, a draft Position Statement on Renewable Energy was endorsed as a consultation draft, to engage with relevant stakeholders and interested parties. It was agreed that if future 'non-material' amendments are required, as necessary such as changes in planning policy, these can be made by Malvern Hills National Landscape Team, in consultation with the Malvern Hills National Landscape Partnership Manager.

## Consultation

6. A formal external consultation led by the Malvern Hills National Landscape Team took place between 19 December 2023 and 28 February 2024. The draft position statement has been published on the Malvern Hills National Landscape website for anyone to make comment, with links to the Position Statement consultation also published on the social media accounts for the National Landscape. Direct email notifications have also been sent to the following:
  - Elected ward and division members of Malvern Hills District Council, Herefordshire Council, Forest of Dean District Council, Worcestershire County Council and Gloucestershire County Council, where the elected members' ward or division lies within the Malvern Hills National Landscape;
  - The Town and Parish Councils within the Malvern Hills National Landscape via the respective Clerks of these Councils;
  - Current members of the Malvern Hills National Landscape Joint Advisory Committee of relevance, including the Malvern Hills Trust, HALC, WCALC, Country Land & Business Association, CPRE, Forestry Commission and NFU;
  - Various agencies and interested parties including Natural England, Historic England, local landscape consultants, local Wildlife Trust, and Local Nature Partnerships; and
  - Local authority staff across the extent of the Malvern Hills National Landscape.
7. Eighteen (18) consultation responses were received, which can be grouped as follows:
  - Town and/or Parish Councils – 3
  - Local Authority departments/staff – 5
  - Agencies – 5
  - Elected Members – 1
  - Public Representations – 4
8. Consultation feedback was largely generally positive on the draft position statement, in principle. Some comments raised lack of clarity, context, and slight concern of terminology/implications regarding one or two of the recommendations being put forward, as well as background and reasoned justification. Changes have been made to reflect this. There is now a stronger narrative which, hopefully, provides a clearer context. The format of the position statement has also been tweaked.
9. All consultation responses have been compiled into a tabulated document, with direct responses from the National Landscape Team and subsequent tracked changes (if applicable) added. Some of the consultation responses were quite

extensive so this table is also extensive. Accordingly, a detailed summary of consultation feedback is available online on the Malvern Hills National Landscape website along with a 'Tracked Changes' version of the position statement. These can be found at: <https://www.malvern-hills-nl.org.uk/position-statement-supporting-documents-for-april-2024-jac/> or can be requested directly via the Malvern Hills National Landscape Planning Officer.

## **Renewable Energy in the Malvern Hills National Landscape and its Setting Position Statement**

10. Climate change has been described as the biggest threat to humanity and is one of the greatest threats to biodiversity. We need to urgently take steps to mitigate and adapt to the impacts of climate change. Renewable energy sources will play a significant role in mitigating the impacts of climate change and progressing towards Net Zero within the Malvern Hills National Landscape and its setting.
11. This draft Renewable Energy Position Statement seeks to expand on the current Malvern Hills AONB Management Plan by providing guidance and recommendations on how we can plan positively for renewable energy provision within the National Landscape and its setting. The level of protection afforded to the National Landscape may mean that some of the area's renewable energy requirements will need to be generated outside of the area, including the setting of the National Landscape. However, we should still seek to make a meaningful contribution to renewable energy provision within the National Landscape.
12. The position statement identifies six main types of renewable energy: heat pumps; biomass; hydropower; solar energy; wind energy; and battery storage.
13. In summary and in principle, the recommendations advise that the Partnership would be supportive of all of these forms of renewable energy at a micro-scale (i.e. less than 0.5ha), provided relevant considerations have been adequately addressed. Small-scale forms of renewable energy (between 0.5ha-5ha), should be considered on a case-by-case basis with relevant landscape and visual considerations particularly relevant. Large-scale forms of renewable energy (5ha and above) are, as a whole, unlikely to be compatible with the statutory purpose of AONB designation.
14. For renewable energy proposals within the National Landscape that are classed as 'major development' (as per Paragraph 183 and Footnote 64 of the National Planning Policy Framework), consideration should be given to whether exceptional circumstances apply that would justify permission being granted for such schemes, particularly in the context of the climate emergency. This again would need to be assessed on a case-by-case basis.
15. Solar and Wind and identification of 'suitable areas' is also considered. Having an approach that is informed by landscape sensitivity assessments (LSAs) is beneficial as when 'suitable areas' are being identified, this should be underpinned by having regard to AONB designation considerations. In practice, this means undertaking a LSA and constraints mapping. These provide a more robust

evidence base to justify size thresholds and a landscape sensitivity-based approach (alongside size-based thresholds) should be sound.

16. It is important to note that this Renewable Energy Position Statement is a 'live' document, which will be updated to reflect changes in policy and renewable energy technology.
17. The Position Statement is aimed at a wide range of stakeholders who are involved in renewable energy provision in the National Landscape and its setting, recognising that in recent months, there have been a number of EIA (Environmental Impact Assessment) Screening applications, and subsequently likely imminent planning applications, which intend to be submitted for large-scale renewable energy development particularly in the setting of the Malvern Hills National Landscape.
18. The only work that is still needed, prior to publication, is some minor editing (for example, numbering paragraphs) and an updated design to align with the 'National Landscape' re-branding guidelines, which staff at Worcestershire County Council are providing assistance with.

### **On-Going Review**

19. It was agreed at the November 2023 meeting of the Committee that a formal review of the Position Statement would take place every five years once endorsed.
20. This position statement will be beneficial as part of training sessions/presentations with elected members as well as Strategic, Neighbourhood Planning and Development Management Officers in local authorities.

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