27th March 2020

Fred Davies
Planning Policy Manager (Malvern and Wychavon Councils)

By email only to contact@swdevelopmentplan.org

Dear Mr Davies

South Worcestershire Development Plan – Renewable and Low Carbon Energy Call for Sites

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the Renewable and Low Carbon Energy Call for Sites.

The Board recognises climate change as being one of the most important issues facing the world today. Becoming carbon neutral will be a key mechanism for addressing this issue at both a global and local level. As such, the Board fully supports the commitment of the South Worcestershire Councils to meet the challenge of climate change and their wish to identify potential opportunities to increase the supply of renewable and low carbon energy in south Worcestershire.

However, as outlined in national policy and guidance[1], achieving carbon neutral status should not be delivered at the expense of other key objectives, such as conserving and enhancing the natural beauty of our most outstanding landscapes, including the Cotswolds and Malvern Hills Areas of Outstanding Natural Beauty (AONB).

The Board notes that this call for sites is only seeking suggestions for land for large scale, stand-alone renewable and low carbon energy projects. The potential adverse effects of *large scale* projects on the purpose of AONB designation needs to be particularly closely scrutinised.

The Board also notes that, after the call for sites deadline, '*Officers will assess submissions to determine the suitability of the land as a potential allocation for renewable or low carbon energy in the SWDP Review'*. Whilst this is a useful starting point, it does not address the suitability of proposals that might come forward once the Development Plan has been adopted. This issue could be addressed by undertaking suitability mapping for the whole of the Development Plan area. This would help to avoid inappropriate, speculative planning applications in unsuitable areas.

Suitability mapping is particularly important for wind energy development. For example, it is a national policy requirement that proposals for such development must be in an area identified as suitable for wind energy development in the development plan. It is also best practice to undertake suitability mapping across the whole plan area for solar energy. [2] Therefore, the Board recommends that, as a minimum, suitability mapping should be undertaken across the whole of the Development Plan area for wind energy and solar energy.

[1] See Annex 1.
[2] The Renewable Energy Landscape Sensitivity Study undertaken by Stratford-on-Avon District Council provides a good example of suitability mapping for wind and solar energy across the whole of a plan area.

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It is important to note that one of the principles for development in the AONBs is that development should be based on robust evidence of need arising within the AONB, as outlined in Policy CE12 of the Cotswolds AONB Management Plan 2018-2023. This principle applies equally to renewable and low carbon energy as it does to other forms of development, such as housing. As such, the focus of renewable and low carbon energy proposals in the AONBs should be to meet the needs of the specific AONB communities where such development is being proposed.

As outlined in Planning Practice Guidance (PPG)[3], land within the setting of AONBs often makes an important contribution to maintaining their natural beauty. Poorly located or designed development in the setting of the AONBs can do significant harm, especially where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Renewable and low carbon energy development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.

To ensure that these issues are addressed in the South Worcestershire Development Plan, the Board makes the following recommendations:

- Suitability mapping should be undertaken for renewable and low carbon energy across the whole of the Plan area, particularly with regards to wind and solar energy. This suitability mapping should:

    - include a landscape and visual sensitivity and capacity study;
    - have regard to all of the factors that contribute to the natural beauty of the AONBs, including their landscape quality, scenic quality, relative tranquillity, natural heritage, cultural heritage and special qualities;
    - have regard to the Cotswolds AONB Management Plan 2018-2023 and relevant guidance published by the Board, including the Cotswolds AONB Landscape Character Assessment, the Cotswolds AONB Landscape Strategy and Guidelines[4] and relevant Position Statements.

- Within the AONBs, the renewable and low carbon energy options that are being considered should be deemed to be major development, in the context of paragraph 172 of the National Planning Policy Framework (NPPF), if:

    - the landscape and visual sensitivity and capacity study identifies that particular types and scales of development would have: (i) significant adverse effects; or (ii) moderate-significant adverse effects (which cannot be adequately addressed through mitigation).
    - they have the potential to have significant adverse effects on the wider factors that contribute to the natural beauty of the AONBs.

    There should be a presumption against permitting such development except in exceptional circumstances[5] and where it can be demonstrated that the development would be in the public interest.

- Within the AONBs and their settings, great weight should be given to conserving and enhancing the landscape and scenic beauty of the AONBs.

[3] Planning Practice Guidance – Natural Environment, paragraph 042.

[4] See Annex 2.

[5] It is important to note that 'exceptional need' does not necessarily equate to 'exception circumstances'.

- Within the AONBs, consideration should be given to the extent to which the renewable and low carbon energy proposals meet the needs of the specific AONB communities where such development is being proposed.

If you have any queries regarding the Board's response, please do not hesitate to get in touch.

Yours sincerely,

John Mills MRTPI
Planning and Landscape Officer

ANNEX 1. GOVERNMENT POLICY AND GUIDANCE RELATING TO RENEWABLE AND LOW CARBON ENERGY IN AREAS OF OUTSTANDING NATURAL BEAUTY (AND RELATING TO THE FACTORS THAT CONTRIBUTE TO THIS NATURAL BEAUTY)

The National Planning Policy Framework states that:

- Paragraph 151: To help increase the use and supply of renewable and low carbon energy and heat, plans should:

  (a) Provide a positive strategy for energy from these sources … while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts).

- Paragraph 154: When determining planning applications for renewable and low carbon development, local planning authorities should:

  (b) approve the applications if its impacts are (or can be made) acceptable.

The Government's guidance on Onshore Wind[6] states that:

- The planning system has a central role in helping to deliver the infrastructure the UK needs to reduce our carbon emissions, ensure security of energy supply and help our economy to grow, while safeguarding our landscape and natural heritage and allowing individual communities the opportunity to shape their environment.

- Projects below 50MW are dealt with at local authority level in England in accordance with the policies set out in the National Planning Policy Framework (NPPF). This commits to safeguarding the natural and historic environment, protecting areas of outstanding natural beauty, sites of special scientific interest and areas of national heritage importance.

- The NPPF also makes it clear that local planning authorities should design their policies to make sure any adverse impacts from renewable and low-carbon energy developments, including cumulative landscape and visual impacts, are addressed satisfactorily.

The Government's guidance on renewable and low carbon energy[7] states that:

- Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable. (Paragraph 001).

- The National Planning Policy Framework explains that all communities have a responsibility to help increase the use and supply of green energy, but this does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities. (Paragraph 003).
- There are no hard and fast rules about how suitable areas for renewable energy should be identified, but in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology and, critically,

[6] https://www.gov.uk/guidance/onshore-wind-part-of-the-uks-energy-mix
[7] https://www.gov.uk/guidance/renewable-and-low-carbon-energy

the potential impacts on the local environment, including from cumulative impacts. (Paragraph 004).

- In considering impacts, assessments can use tools to identify where impacts are likely to be acceptable. For example, landscape character areas could form the basis for considering which technologies at which scale may be appropriate in different types of location. Landscape Character Assessment is a process used to explain the type and characteristics of landscape in an area. (Paragraph 005).

- In shaping local criteria for inclusion in Local Plans and considering planning applications in the meantime, it is important to be clear that:
    - the need for renewable or low carbon energy does not automatically override environmental protections;
    - cumulative impacts require particular attention, especially the increasing impact that wind turbines and large scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases;
    - local topography is an important factor in assessing whether wind turbines and large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas;
    - great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;
    - proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration;
    - protecting local amenity is an important consideration which should be given proper weight in planning decisions. (Paragraph 007).

- Renewable energy developments should be acceptable for their proposed location. (Paragraph 010).

- Where a planning application is required [for active solar technology], factors to bear in mind include … the effect on a protected area such as an Area of Outstanding Natural Beauty. (Paragraph 012).

- Particular factors a local planning authority will need to consider [for large scale solar farms] include:
    - the proposal's visual impact [and] the effect on landscape of glint and glare;
    - heritage assets;
    - the potential to mitigate landscape and visual impacts. (Paragraph 013).

- What are the particular planning considerations that relate to wind turbines? (Paragraph 014). These include:

    - Noise
    - Ecology
    - Heritage
    - Cumulative landscape and visual impacts

ANNEX 2. RELEVANT EXTRACTS FROM THE COTSWOLDS AONB LANDSCAPE STRATEGY AND GUIDELINES

Local Forces for Change	Potential Landscape Implications	Landscape Strategies and Guidelines
Introduction of vertical elements such as … wind turbines.	• Introduction of visually intrusive 'urban' or industrial features to the outliers or their setting. • Loss of open character and 'natural' appearance. • Introduction of unnatural movement and loss of tranquillity and sense of remoteness. • Intrusion on the setting of scheduled monuments, listed buildings and designed landscapes. • Breaking up of outlier skyline. • Impact on views to and from the outliers.	• Conserve the open, remote character by objecting to the development of vertical elements on the skyline or where these would adversely affect views across to and from the outliers. • Ensure the development of vertical elements in neighbouring areas beyond the AONB or in adjacent LCTs do not adversely affect views to and from the [specific landscape character type]. • Ensure alternative options have been fully considered. • Consider other renewable energy technologies. • Ensure full assessment of heritage setting impacts and appropriate measures undertaken.
Solar Farms on or in the setting of the outliers	• Industrialisation of the rural landscape. • Change of character due to colour and texture and heliographic glint. • Loss of seasonal change in the landscape. • Loss of characteristic pastoral / agricultural landscape. • Damage to and loss of landscape features such as Ridge and Furrow, Strip Lynchets, trees, walls and hedgerows. • Concealment of geomorphological or archaeological features.	• Prevent proposals for solar farms that will impact negatively on landscape character and/or intrude into views to and/or from the [specific landscape character type]. • Avoid proposals that will result in the loss or harm to landscape features such as Strip Lynchets, Ridge and Furrow, hedgerows and walls. • Ensure a comprehensive LVIA is undertaken (including potential cumulative effects). • Ensure a glint/glare assessment is undertaken to determine the heliographic impact on receptors. • Reduce landscape impact with appropriate screening. • Bury cables underground and seek opportunities to bury existing power lines. • Keep supporting infrastructure to a minimum and ensure it is in keeping with landscape character.

	• Impact of supporting infrastructure such as buildings, cables, roadways, security fencing, CCTV masts and lighting. • Decline in the quality of landscape.	• Ensure removal and restoration on temporary construction access. • Avoid the inclusion of any security lighting proposals. • Seek appropriate landscape enhancement to field boundaries and margins within solar farm development proposals. • Promote the use of roof space for photovoltaic panels particularly on modern farm buildings.