



REFERENCE	M/24/01781/FUL
CASE OFFICER	Lee Walton
LPA	Malvern Hills District Council

10 March 2025

LOCATION	Monksfield Farm Monksfield Lane Newland Worcester WR13 5BB
DESCRIPTION	Construction of a solar farm and battery energy storage system together with all associated works, equipment and necessary infrastructure.

POSITION	Objection	FURTHER INFORMATION REQUIRED	Yes
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POLICY CONTEXT FOR PROTECTED LANDSCAPES

NPPF (2024)

The Malvern Hills National Landscape is designated as an Area of Outstanding Natural Beauty (AONB)¹. [Paragraph 189](#) (December 2024) of the National Planning Policy Framework (NPPF) outlines the 'great weight' to be given to the conservation and enhancement of the landscape and scenic beauty, including the wildlife and cultural heritage, of designated AONBs. The NPPF stipulates that the "*scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.*"

CRoW Act (2000)

[Section 85](#) of the Countryside and Rights of Way Act (2000) emphasises that in exercising or performing any functions in relation to land in an AONB, "*a relevant authority **must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.***" In reaching its planning decision, the local planning authority (LPA) has a duty to seek to further the statutory purpose of conserving and enhancing the natural beauty of the National Landscape.²

This duty should be explicitly addressed within the decision including an explanation of how the LPA considers the duty has been discharged. Further guidance on the duty to 'seek to further' has been produced by [DEFRA](#) and the [National Landscape Association](#).

Malvern Hills AONB Management Plan 2019-2024

As a statutory plan, the [Malvern Hills Area of Outstanding Natural Beauty Management Plan 2019-2024](#) is a material planning consideration in decision-making on planning applications. [Policy BDP2](#) states that "*development in the AONB and its setting should be in accordance with good practice guidance including that produced by the AONB Partnership*". Guidance and positions statements produced by the MHNL Partnership provide further details on how local authorities, developers and other stakeholders can ensure the purpose of AONB designation is not compromised by development and complies with the

¹ From November 22nd 2023, all AONBs in England are known as National Landscapes. The statutory designation remains an area of outstanding natural beauty (AONB) and is still referred to as such in policy and legislation. For this reason, this document still uses the term AONB.

² Protected landscapes' means national parks, the Broads and national landscapes.

relevant national, local and AONB management plan policies. The most relevant guidance to this application are listed in the 'Further Guidance' section below/

COMMENTS

Thank you for consulting the Malvern Hills National Landscape (MHNL) Team on the above application which would be located in the setting of the Malvern Hills National Landscape. **Further information is required to demonstrate there will not be adverse impacts on the Malvern Hills National Landscape by the proposed development.**

Protected landscapes and climate adaptation

As well as Policy BDP2 referenced above, Policy BDP8 in the Malvern Hills AONB Management Plan states that

"Appropriate scale renewable energy schemes should be encouraged where these support the management of core elements of the AONB landscape and/or where they do not negatively affect the distinctive attributes or special qualities of the AONB."

Our Position Statement on Renewable Energy in the Malvern Hills National Landscape and its Setting ([link](#)) expands on how LPAs, developers and stakeholders can consider and apply Policy BDP8.

The Position Statement on renewables explains how many of the defining features and 'Special Qualities' of the AONB designation are threatened by climate change, and that renewable energy has an important role in mitigating these impacts and achieving decarbonisation. The Third National Adaptation Programme (NAP3), published in July 2023 by Defra, identifies and implements actions in response to 61 climate risks and opportunities published in the January 2022 Climate Change Risk Assessment (CCRA). The NAP3 details a wide range of climate-based actions, impacting Protected Landscapes. To help mitigate this risk, all protected landscapes³ are being asked to prepare Climate Change Adaptation Management Plans (CCAPs) produced, embedded in, or linked with, their Management Plans by 2028, and in all future Plans.

The MHNL Team are currently working on a CCAP for the National Landscape, including the role of renewable energy. However, without good design, renewable energy technologies in the MHNL and its setting may also harm several of the protected area's 'Special Qualities'⁴. Our concerns that there is insufficient information provided by the applicant with regard to impacts on the National Landscape are outlined below.

Scale of development within the setting of the MHNL

Our renewables Position Statement states that in principle, the MHNL Partnership would be supportive of domestic and micro solar schemes. However, *"in relation to large-scale schemes, the MHNL Partnership would not be supportive of solar energy schemes within the MHNL or its setting larger than five hectares in size"*. The Position Statement states that:

³ See footnote 2.

⁴ Page 9 of the Malvern Hills Area of Outstanding Natural Beauty Management Plan 2019-2024. AONBs are designated by reason of its special qualities; those aspects of the area's natural beauty which make the area distinctive and are the key attributes on which the priorities for its conservation and enhancement are based.

*“Applicants for large-scale solar energy schemes above 5ha should be required to **robustly demonstrate** that the scheme will protect, conserve and enhance the natural beauty of the Malvern Hills National Landscape and/or its setting, and will conserve and enhance the historic environment. In addition to the impact of the panels themselves, consideration should also be given to the impacts of any additional infrastructure that is required for the scheme, particularly during construction, operation, maintenance, and decommissioning.”*

Section 6.4.4 in the Position Statement specifically addresses why the MHNL and its setting is unlikely to be able to accommodate large-scale solar developments as they will:

- Be highly visible in open landscapes, when looking at from high ground, and on the upper slopes of hillsides, especially where covering significant areas;
- Lead to a perceived increase in human/industrialising influences on the landscape;
- Result in land use change and the appearance of one or more fields, affecting land cover textures and patterns;
- Introduce a regular edge (to the panels) that can be particularly conspicuous in more irregular landscapes (especially where the panels do not follow contours).

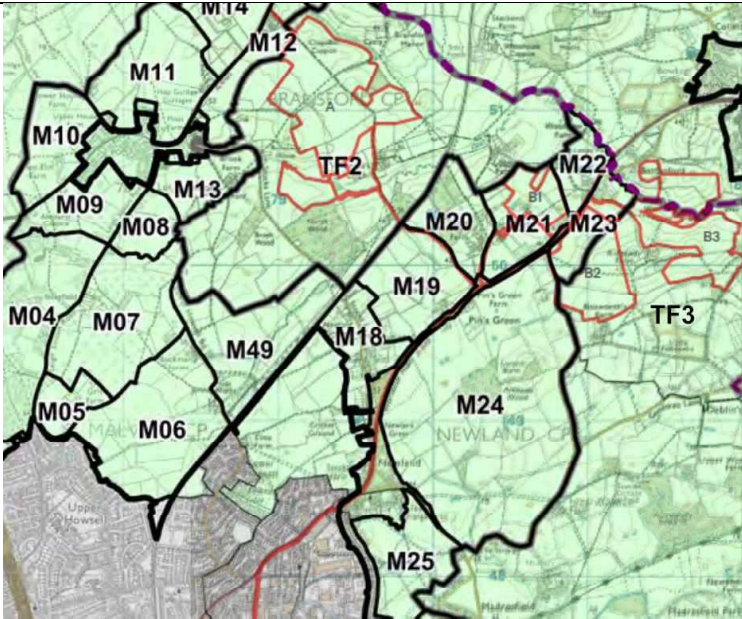
The application is for a large-scale solar development, covering four areas of predominantly arable land between the parishes of Newland, Powick and Bransford. The parcels of land for development are not contiguous, but in total the area for the proposed development is approximately 124.8ha, covering a length of approximately 3km from Parcel A near Leigh Sinton, heading east to Parcel B3 at Ridgeway Farm. The applicant’s LVIA describes the ‘Proposed Development’ as comprising:

“Proposed installation and operation of a renewable energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers with all associated works, equipment, necessary infrastructure and landscaping and biodiversity enhancements.”

This lack of capacity for large-scale development is evidenced in the Malvern Hills AONB Environs Landscape and Visual Sensitivity study (2019)⁵, commissioned by the South Worcestershire Council’s (SWCs) as part of the evidence base for the South Worcestershire Development Plan Review (SWDPR). The study areas covers most of the application land, but it is not referred to in the LVIA or the applicant’s supporting documents. The following areas in the study correspond to the applicant’s parcels:

- Parcel A: Landscape Character sub-area TF2
- Parcel B1: Land Parcel No. M21
- Parcel B2: Land Parcel No. M23 & Landscape Character sub-area TF3
- Parcel B3: Landscape Character sub-area TF3

⁵ White consultants (2019) Malvern Hills AONB Environs Landscape and Visual Sensitivity study ([link](#))



The Environs study describes how the visual sensitivity for TF2 (applicant's Parcel A) lies in its "openness" and being overlooked by the Malvern Hills as a "clear separation between developed corridors and separating Malvern from Worcester." Land Parcels M21 and M23 (applicant's Parcel B1 and B2) were assessed as having no capacity for development, regardless of type or scale, due to its high sensitivity. TF3's visual sensitivity is also described as resulting from its openness and being overlooked by the Malvern Hills.

The MHNL Partnership's Position Statement on Development in the Setting of the MHNL ([link](#)) contains examples of adverse impacts resulting from inappropriate development in the MHNL setting. Given the scale of the proposals in this application these include:

- development which would have a disruptive visual impact on views out of the MHNL;
- introduction of abrupt change of landscape character (including the addition of tall structures, masts etc.;
- change of use of land where of a significant enough scale to cause harm to landscape character;
- inappropriate use of external materials, external colours, reflective surfaces, and inappropriate landscaping.

As such, the MHNL Partnership recommends the use of Landscape Sensitivity and Capacity Assessments (LSCA) to inform land for development, and objectively identify sites which have the least adverse impacts in landscape and visual terms.

The 2019 Environs study has not been referred to in the application, and a LSCA has not been carried out by the applicant as part of the site selection process. There is no reference to the setting of the MHNL and its sensitivity in the 'Planning Statement Appendix 6 Site Selection Explanation' report. Given the scale of development being proposed, the MHNL Team do not find that the applicant's LVIA and supporting documents adequately address or assesses the impact of the development on the designated area. As such, the proposals are unlikely to comply with NPPF Para. 189 as they do not demonstrate that development within the National Landscape setting has been sensitively located.

Assessment of the full extent of the visual impact on the National Landscape

Policy BDP4 in the Malvern Hills Management Plan states that “*development proposals that may affect land in the AONB, including those in its setting, should protect and/or enhance key views and landscape character. AONB guidance relating to views and development in views should be used where relevant.*” The MHNL Partnership has published Guidance on Identifying and Grading Views and Viewpoints ([link](#)).

One of the special qualities⁶ of the MHNL is the “*dramatic scenery and spectacular views arising from the juxtaposition of high and low ground.*” Given the national importance of the panoramic views from the MHNL, the applicant’s LVIA is limited in its choice of viewpoints from the designated area, and does not assess more broadly how the proposed development will alter views. The 3.5km study area for the LVIA captures some of the MHNL but does not consider receptors in northern, elevated parts of the designated area, such as the Worcestershire Way where it passes through the parish of Storridge, or further south along the ridge of the Hills. GLVIA3 states the study area should include “*the full extent of the wider landscape around which the proposed development may influence in a significant manner*”⁷. The 3.5km study area is therefore limited in scope and does not consider the full extent of receptors within the designated area that may be impacted by the development.

This is also reflected in the applicant’s Zone of Theoretical Visibility (ZTV). As well as being limited by the 3.5km study area, which excludes much of the MHNL, the applicant has used a Screened ZTV rather than a bare-earth, terrain model as stipulated in GLVIA3. A bare-earth, terrain model would provide a ‘worse-case’ scenario. Although it is argued that large scale ground-mounted solar developments are temporary and reversible, there is no precedent to judge this since no UK solar sites have yet been subject to restoration and agricultural reversion. Similarly, it is impossible to guarantee with any certainty which views would be screened by vegetation or buildings over a period of 40 plus years. For example, it is likely that a number of trees currently in place and offering some screening are ash, which are very likely to succumb to ash dieback over this period. It is therefore important that applicants provide a bare-earth ZTV as well as a screened version, especially for this size of development.

Even when factoring in intervening structures, topography and vegetation, the applicant’s Screened ZTV highlights the visibility of the site from elevated positions, where it will be almost impossible to mitigate the impact on landscape character and visual effects from the MHNL. In its assessment of the two viewpoints from the MHNL, the LVIA appears to contradict itself by saying:

“the areas of panels would be considerably smaller and positioned within...the existing field structure created by surrounding mature hedgerows which also provide a level of screening. This combined with proposed planting will help to reduce the visibility of the proposed development over time.”

However, the assessment then goes on to acknowledge that

“due to the elevation of the view looking down on the surrounding landscape it is likely mitigation measures would not be as effective as they are on more local views.”

⁶ See footnote 3.

⁷ Landscape Institute & IEMA (2013) Guidelines for Landscape and Visual Impact Assessment, Third edition (GLVIA3)

The assessment has also not considered the other taller structures besides the 3m panels associated with the development, which overall will introduce industrial features into open countryside. The MHNL Team therefore strongly disagree with the LVIA's statement in para. 7.8 that there would "*be no major effects on views experienced by users of the Malvern Hills National Landscape.*" The LVIA is not robust enough in its assessment of effects of the MHNL to justify this conclusion.

This lack of robust evidence is demonstrated in the two viewpoint photos from the MHNL in the applicant's LVIA. Only a vague 'approximate site extent' on the viewpoint photos is provided. This does not give an accurate or helpful representation of exactly where the development will be located in views and the level of landscape change and visual effects this may have. The MHNL Team feel this is inadequate and unacceptable in the application given the modelling⁸, technology and information available to the developer, such as the photomontages produced for other viewpoints. More accurate and detailed information should be provided by the applicant given the scale of the development, proximity to a protected landscape and potential impacts.

In order for us to understand where the development will sit in the panoramic views from the Hills, the MHNL Team have attempted to produce our own, quick viewpoint photos highlighting where the development would be located – see Appendix 1 and 2 attached to this document. The parcels will be visible to varying degrees, but they demonstrate that no mitigation is likely to be effective at screening the panels and other structures due to the difference in elevation. The development would result in a landscape change from arable fields to an industrial character. Rather than open countryside between development corridors, this would be read by receptors as development across a large area in some of the key, nationally significant views from the MHNL. As such, we find that the LVIA does not provide sufficient evidence that the proposals would comply with NPPF para. 189 and would be sensitively located and designed.

Summary & Conclusion

The MHNL Team are in principle supportive of renewable technologies and know that such schemes have an essential role to play in mitigating against climate change, the effects of which are already, and will impact on the National Landscape. However, the level of protection afforded to protected landscapes may mean that some of the area's renewable energy provision will need to be met in areas outside of the Malvern Hills National Landscape and its 'immediate'⁹ setting. The extent of the proposed development would significantly change the landscape character, but the application does not sufficiently demonstrate that the proposals are sensitively located.

The Malvern Hills National Landscape has the Special Quality of '*dramatic scenery and spectacular views arising from the juxtaposition of high and low ground.*' As a consequence of this, for solar sites over 5ha, it is unlikely that sufficient mitigation would be possible to avoid adverse effects to the landscape and visual baseline. The MHNL Team is of the view that the scale of the proposals would have an adverse urbanising effect on landscape character in the setting of the MHNL, and subsequently have adverse visual effects on views from the MHNL. Hence, supporting the current scheme would not be consistent with the statutory purpose of AONB designation, and paragraphs 189 and 190 of the NPPF.

The MHNL Team therefore **objects** to the proposal.

⁸ UK BIM Framework (link)

⁹ For example, the MHNL Team did not object to a large solar site in Ripple, Tewkesbury (23/00499/FUL) which was considered in the setting of the MHNL due the scale, siting and nature of the development, with visibility from the Hill. However, it was considered that the separation distance meant there was unlikely to be conflict with the purpose of designation.

FURTHER GUIDANCE

- Position Statement 1: Development and Land Use Change in the Setting of the Malvern Hills National Landscape ([link](#))
- Position Statement 3: Landscape-led Development ([link](#))
- Position Statement 4: Renewable Energy in the Malvern Hills National Landscape and its Setting ([link](#))
- Malvern Hills AONB: Guidance on Identifying and Grading Views and Viewpoints ([link](#))
- Cooper Partnership (2009) Identification of Key Views to and from the Malvern Hills Area of Outstanding Natural Beauty ([link](#))

We trust you will take the above into consideration when arriving at your decision.

Kind regards,
Catherine Laidlaw PGDip LA

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