

# Position Statement



## Renewable Energy

English NPAs are strong supporters of energy efficiency and renewable energy projects that respect the special qualities of National Parks. We welcome and promote small scale community schemes, and many NPAs are demonstrating how energy efficiency and the use of renewable energy can be achieved without damaging the special qualities of National Parks through their own patterns of energy use. We aspire to be exemplars in this respect and are committed to being carbon neutral NPAs by 2012. We will, however, also object with equal vigour to those developments that threaten the qualities of the National Parks or the experience of them- whether inside or outside the boundary of the designated area.

## England's National Parks

Our National Parks are a truly national treasure. They are also living landscapes peopled by farmers, others who manage the land and people living in rural communities. Each of the nine National Parks in England has a National Park Authority. These are independent bodies, funded by central Government. National Parks have two purposes, to:

- conserve and enhance their natural beauty, wildlife and cultural heritage; and
- promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public.

In carrying out these purposes, they have a duty to seek to foster the economic and social well-being of local communities within the National Park.

## Renewable Energy and National Parks in England

As part of its programme of tackling climate change, and to diversify energy sources, the Government has established a target to generate 10% of electricity supply by renewable sources by 2010. It aims to increase this to 20% by 2020. This 20% target has also been agreed at an EU level.

Although renewable energy has been growing rapidly, in 2005, it still only contributed 4.2% of the UK's electricity supply. Most of this came from biofuels, waste, and large scale hydro.

These national targets are, through national policy, being translated into regional and sub-regional targets in Regional Spatial Strategies and Renewable Energy Strategies. These cover the need for new renewable energy generation to meet existing energy needs, or as part of new developments.

National policy is set out in Policy Position Statement 22 *Renewable Energy*. This highlights the important role for spatial planning in encouraging renewable energy. PPS22 contains a number of principles that are to be applied by planning authorities. It also makes clear that planning permission should only be granted where the development would not compromise the objectives behind the designation. For National Parks this

will be the conservation of natural beauty, wildlife and cultural heritage, and the opportunities for the public to experience, understand and enjoy the National Park. PPS22 goes on to state that spatial planning policies should identify the scale of renewable energy developments that may be acceptable in particular areas.

Sensitive landscapes tend to be the favoured sites, in particular, by promoters of wind developments because of the higher average wind speeds found there. The size of onshore wind developments is also increasing. Some applications being submitted that would be adjacent to National Parks are for turbines that would stand 125m high to the tip of its blade. The scale of such proposals adds to the conflicts between achieving different policy objectives.

There is increasing interest in harnessing the significant potential of the wind offshore, and in wave and tidal power. Several National Parks have significant coastlines where potential exists and Authorities have supported schemes. But here too, this requires an effective marine planning system to protect important seascapes and wildlife. The effects of any infrastructure needed to link these developments to the mainland also need careful consideration.

There is also increasing interest in biomass and bio fuels, and while there is great potential in small scale schemes that could support local economies, as with all developments, they need to be sensitive to National Park qualities. Developments in this area should avoid, for example, undermining traditional farming techniques or landscape character and compliment them where-ever possible.

Opportunities exist for other sympathetic developments and these are being explored (such as hydro, ground source heat pumps etc.). Small scale developments that are appropriate to their surroundings and which meet local needs can reduce energy lost through long distance transmission, as well as support local economic well being.

National Park Authorities are playing their part in promoting small scale domestic renewables in line with Govt policy. For example:

- in England, the nine NPAs have used over £710,000 of the Sustainable Development Fund to support 53 renewable energy projects;
- these have been for biomass, biodiesel, hydro, solar, a combination of technologies, as well as projects that help educate and raise awareness amongst young people and the public at large of the opportunities for renewables;
- NPAs are using renewable energy to meet their own needs, with one Authority already receiving all its energy needs from a hydro scheme;
- NPAs are granting planning permission for appropriate renewable energy schemes – with one NPA for example approving 8 solar panels, 29 wind turbines and 7 hydro schemes.

National Park Authorities are keen to make a strong positive contribution to energy management (both generation and efficiency of use) and demonstrate a way forward for protected areas that can be applied further afield too.

## **ENPAA's Position**

### Putting wind farms in context

Most attention to date has been on large scale wind developments. These have been highly controversial with views being polarised. The Government believes that both on and offshore wind will contribute 7-8% towards the 10% target for 2010. The industry has estimated that an additional 2,000 onshore turbines would be needed by then.

The renewable energy debate is forcing people to revisit the way we value landscapes – and this requires a good understanding of the qualities of the National Park.

ENPAA believes it is important not to focus on just one form of renewable energy – one that frequently intrudes visually into sensitive landscapes; and may be some distance from areas of greatest energy demand. The scope for wave, tidal and other renewable energy technologies need to be thoroughly investigated. In addition to their impact on landscape and visitor experience, large scale wind developments have the potential to damage existing habitats such as peatlands that currently store large volumes of fossilised carbon. Building wind developments that threaten these stores would be counter-productive in the fight against damaging climate change.

Large scale wind is only one response to climate change and we need a concerted effort to ensure renewable energy schemes are compatible with National Park purposes and qualities.

### Reducing energy needs

NPAs are taking action to reduce emissions that contribute to climate change, to raise awareness amongst visitors, and are examining how best to adapt management strategies to protect National Parks given a changing climate. Indeed, the National Park Authorities are committed to ensuring they are carbon neutral by 2012, and aspire to having carbon neutral National Parks (see ENPAA's *Climate Change Position Statement*).

As a nation we urgently need to reduce overall energy demand and consumption. This should be the first priority for energy policy – nationally, regionally, and locally. NPAs strongly support a sustainable energy hierarchy in which the highest priority is given to energy conservation, and then improved energy efficiency, using renewables; and then making sure the continuing use of fossil fuels is made more clean and efficient. In this way, renewable energy should be part of the overall approach of shifting to low carbon sources of energy and reducing emissions, rather than new infrastructure designed to satisfy ever-increasing energy demands.

NPAs wish to demonstrate ways forward for renewable energy that are consistent with protecting the special qualities of the National Parks. But NPAs will, with equal vigour, object to those developments (including those outside National Park boundaries) that threaten the qualities of the National Parks and/or run counter to either of their statutory purposes.

### Promoting renewable energy in National Parks

NPAs aspire to become exemplars for environmentally sensitive small scale renewable projects. The 53 projects that are already supported shows what can be achieved through working with local communities.

Working in such sensitive environments requires creativity to ensure renewable energy developments are of an appropriate scale, location and design to the character of the landscape. It requires innovation in the use of technology too. NPAs aim not just to conserve, but to enhance the qualities found within National Parks.

NPAs themselves are users of renewable energy and committed to being carbon neutral by 2012. They are supporting the uptake of its use. This has been through:

- continuing to be supportive of the Community Renewables Initiative and successor schemes;
- using the Sustainable Development Fund to support local energy schemes; and

- using the reviews of Local Development Frameworks (LDFs) to consider the potential and how best to support small scale renewable projects that are compatible with the special qualities of National Parks (for example through the policies adopted and/or the production of Design Guides).

NPAs will look to Local Strategic Partnerships and those responsible for developing Local Area Agreements (LAAs) to explore how these might further the take up of appropriate small scale renewable energy projects, including in protected areas.

#### Improving the decision making process through planning and development control

An effective process for handling controversial development proposals in highly sensitive landscapes is essential. Yet, the decision making process needs to be improved in a number of important respects. Currently NPAs are facing multiple applications by different applicants, each of which may be decided separately by different authorities and not all together. One National Park Authority alone faced 13 planning applications for renewable energy developments. These were submitted by different applicants but simultaneously on sites in, or adjacent to the protected area.

ENPAA believe there needs to be guidance and improved policy on addressing the cumulative effects from large scale developments, including with those outside National Park boundaries.

The trend (driven by changes in technology and larger scale proposals) is for more applications to be decided by the DTI under the *Electricity Act 1989*, rather than by the Local Planning Authority. This is regrettable given that the recent Local Government White Paper is encouraging a greater focus on local decision making and involvement.

NPAs strongly support the use of carbon emissions reduction targets. And as part of this, support the use of renewable energy targets overall. Because of the sensitivity of the environment within National Parks, however, care will need to be taken in how these are formulated.

If a wind development is considered, so too should be the implications of its connection to the grid as part of the same application.

Developers of all renewable energy schemes should be required to explicitly set out the impact of their proposals on the special qualities of the National Park, or other nationally protected area and how the experience of these would be affected.

In reaching a view about potential developments, NPAs will continue to examine each application (whether inside or outside of the National Park and irrespective of the type of renewable energy) on a case by case basis, governed by the policies/ criteria in its Local Development Framework (LDF).

We will encourage promoters of renewable energy developments to demonstrate how they would provide long-term, sustained support to the economic and social well being of the local community. And NPAs will continue to examine the cumulative effect of proposals - both in combination with other power generating developments, existing developments, and in relation to grid connections.

#### Taking a holistic approach

We are seeing more applications for large scale developments outside of National Park boundaries. Yet these still have the potential to damage the National Parks' open land and seascapes.

ENPAA believes the special qualities of National Parks should be fully taken into account in all decisions (both onshore and offshore). The key test will always be whether the qualities of the National Park and the ability of people to experience and enjoy them would be negatively affected?

It is important to recognise that National Parks cannot be protected as isolated islands, separate from their surrounding areas. The decision by the Government to reject the proposal for a large scale wind farm development at Whinash is a welcome recognition of this.

### Monitoring and review

ENPAA will review this Position Statement, and progress towards achieving it, on an annual basis.

### **Supporting action**

National Park Authorities are committed to demonstrating and supporting small scale renewable energy projects that protect the qualities of the National Parks, and people's ability to experience them. We also need to ensure these sensitive environments are protected from inappropriate developments.

We look to Government to:

- see a much greater role for community-based micro-renewables in energy policy – particularly in protected areas;
- bring forward amendments urgently that would introduce a banded Renewables Obligation that better supported small scale renewable energy generation;
- prepare a good practice guide on considering planning applications close to National Parks and for DCLG Ministers to make an appropriate statement that clarifies matters of concern;
- strengthen the status of NPAs comments (by making them statutory consultees) for applications beyond the National Park boundary where these might nevertheless affect the reason for designation;
- provide a more important role for NPAs themselves in determining the assessment of whether the qualities of the National Park and the experience of them will be compromised, when applications go before a Regional or Local Planning Body or the DTI – and ensuring adequate weight is given to such assessments when decisions are taken;
- amend S.36 of the *Electricity Act 1989* so that a higher proportion of renewable energy projects are decided by their local planning authority, rather than the DTI;
- provide greater financial support to NPAs given the significant resource implications of handling many applications in such sensitive landscapes;
- support NPAs, Regional and Local Planning Bodies in considering the cumulative effects of development proposals as part of the forward planning process, as well as when determining individual planning applications;
- resolve the problems for NPAs caused by separate consent regimes for energy suppliers and transmission companies by requiring joint applications, EIAs and public inquiries.

We also look to:

- Natural England to develop guidance on dealing with the cumulative impacts of wind and other renewable energy developments (as already exists for wind in Scotland), and the practical application of 'environmental limits' in decision making;
- Natural England, English Heritage and other bodies with expertise to continue to disseminate examples of developments that integrate vernacular design principles with those of sustainable

development, and consider how the energy costs associated with materials and new construction can be factored into planning decisions;

- those producing Regional Spatial Strategies and Local Development Frameworks to include policies and criteria that require particular care be taken to ensure that no development is permitted outside a National Park or AONB that would damage their natural beauty, character and special qualities or otherwise prejudice the achievement of their purposes;
- those producing Regional Spatial Strategies and Local Development Frameworks to inform their policies and criteria for determining planning applications on the basis of a full assessment of landscape sensitivity;
- the same bodies should require all applications for new renewable energy developments to be accompanied by clear proposals on the necessary grid connection;
- other Agencies like the Carbon and Energy Saving Trusts to work closely with and support NPAs so that National Parks can take a more proactive role and become exemplars of low carbon communities and businesses; and
- ensure the Energy Efficient Advice Support Service, that provides independent technical advice and expertise to planning authorities, continues beyond 2007 when it is currently due to cease operation.

The English National Park Authorities Association (ENPAA) provides a collective voice for the National Parks. This statement sets out their shared position on Renewable Energy. Each Authority works to implement the Management Plan for its area, and so each National Park Authority will need to implement this and other policies in ways that are compatible with this plan and appropriate to local circumstance.

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