



## **Consultation on Draft Planning Policy Statement: Planning for a Low Carbon Future in a Changing Climate**

### **A Consultation Response by the English National Park Authorities Association**

#### **Introduction**

1. The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the English National Park Authorities. It is governed by the Chairs of the National Park Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs). Individual National Park Authorities may submit separate comments, which will draw on the specific issues for their particular area. ENPAA is happy to have this response made public.

#### **National Park and Climate Change – Context**

2. ENPAA believes that the management of our National Parks has a major contribution to make in mitigating the effects of climate change and adapting to the inevitable changes ahead. We believe there are four key areas where NPAs and their partners have a major contribution to make in mitigating and adapting to climate change:

- a sustainable approach to land management;
- the development of rural low carbon communities;
- adaptation to climate change on a landscape scale; and
- engagement with the public on the issues and solutions around climate change.

3. Further details of the commitment of the National Park Authorities are set out within the ENPAA Statement *Climate Change Mitigation and Adaptation in National Parks*<sup>1</sup> which was launched by the Secretary of State for Environment, Food and Rural Affairs in December 2009. This notes, for example, that 'spatial planning is of fundamental importance in delivering sustainable development and has a pivotal role to play in climate change mitigation and adaptation'.

4. NPAs use planning powers to conserve and enhance natural and cultural resources, promote appropriate renewable energy and energy efficiency measures and shape future development within National Parks. NPAs provide a positive planning approach towards energy efficient new builds, and use their powers to ensure that climate change is taken into account in the siting and design of all new development.

5. NPAs have significantly high approval rates for micro generation planning applications, for example, between April 2004 and March 2009 the North York Moors NPA approved 83% of these applications. In addition NPAs development plan policies provide a positive framework for the development of small scale renewable energy within National Parks. The Northumberland National Park Core Strategy, for example, requires all new development to realise the potential for onsite renewable energy generation and as a minimum, all new units of residential, employment, community and tourism development are

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<sup>1</sup> [http://www.nationalparks.gov.uk/enpaa/whatsnew/enpaa\\_-\\_2009\\_updates/climate\\_change\\_statement.htm](http://www.nationalparks.gov.uk/enpaa/whatsnew/enpaa_-_2009_updates/climate_change_statement.htm)

required to embed renewable energy within the development to offset at least 10% of the predicted energy requirements. The Broads Authority has developed a Sustainability Guide to aid property owners, designers and local residents when designing new buildings. It has sections on designing buildings to adapt to climate change, embedding energy efficiency, choosing materials which have a low impact on resource depletion and energy consumption.

## **Response to Consultation Questions**

### **Questions 1-3**

6. ENPAA supports a number of elements of the draft Planning Policy Statement (PPS), particularly the overarching positive policy framework to allow for the provision of appropriate renewable and low-carbon energy and the proposed consolidation and streamlining of the supplement to PPS1 and PPS22 on renewable energy into a single PPS.

7. However, the draft PPS refers frequently to the information contained within the National Policy Statement (NPS) for Renewable Energy Infrastructure which was consulted on recently. In response to this consultation ENPAA expressed serious concerns about a number of elements of the draft, particularly the need for reference to existing national planning policy on national and international designations and reference to overriding public need. ENPAA therefore requests that CLG look carefully at the response<sup>2</sup> to the NPS and consider it in the framework of both the NPS and the PPS, considering also the links between the two documents.

8. As the outcome of the NPS consultation is not yet known it is difficult to assess the full implications of some elements of the draft PPS for National Parks. For example policy LCF14: Paragraph LCF14.2(i) states *'For wind energy development the approach to assessment and policies set out in NPS for Renewable Energy Infrastructure should be used'*. This policy in turn refers to criteria in the NPS, which states *'where relevant, those making decisions on such applications should apply the policy and guidance in this NPS as far as practicable'* as a material consideration. Paragraph LCF14.2 (vii) goes on to state *'where the proposed development is for a renewable energy technology included in the NPS for Renewable Energy Infrastructure, or associated infrastructure, expect applicants to follow the approach to assessment and apply themselves as far as practicable the approach to decision making and mitigation set out in NPSs'*.

### **Question 4**

9. In the light of the recent government decision to abolish regional spatial strategies the draft PPS will need to consider how to deal with matters of regional renewable energy capacity, by local targets and the spatial expression of new development in order to achieve a low carbon future. The target setting approach referred to in policy LCF2.2 should in any case take account of the region's environmental capacity and the type and amount of renewable energy that a region is likely to be able to deliver within this capacity;

### **Question 5**

10. ENPAA welcomes the requirement set out in policy LCF1.4 for local authorities to develop sound evidence bases and information about renewable energy potential in their areas, however, there must be recognition that resources will need to be available to properly achieve this.

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<sup>2</sup> The full response is available at <http://www.nationalparks.gov.uk/enpaa/consultation-responses.htm>

## Question 6

11. Policy LCF7.5, as written could potentially hinder sustainability in relation to bioenergy proposals. It is suggested that greater emphasis is placed on encouraging local sources of supply and ensuring all sources are derived sustainably.

### Other Comments

12. ENPAA welcomes the requirement in Policy LCF4 (ii) (b) for planning authorities to develop local criteria based policies for the protection of landscapes, recognising that the scale and impact of development in nationally recognised designations should be compatible with the purpose of the designation. ENPAA however expresses concern that the new PPS, as written, will weaken the existing protection given to the setting of National Parks set out within paragraphs 19-22 of PPS22 and within paragraph 31 of the newly published National Parks Circular which states that *'Major developments in or adjacent to the boundary of a Park can have a significant impact on the qualities for which they were designated'*. The draft PPS does not identify a need to protect the impact of renewable and low-carbon energy and associated infrastructure on nationally recognised designations where the development is proposed outside the boundaries. Such development could impact on the purpose of the designation. Protection is currently set out in paragraphs 14 of PPS22 which will be superseded by this and the Natural and Healthy Environment PPS.

13. Other comments we would make include:

- Policy LCF13.4 states that incompatibility with the existing townscape should only be the grounds for refusing planning applications – innovative design should be integrated with local character, not simply townscape;
- the emphasis within policy LCF14.2 (viii) on the potential for impact on the Greenbelt of renewable energy development, appears to give greater weight to the protection of Green Belts than policy LCF4.1 (ii) (b) does on the protection of National Parks and other nationally designated areas; and
- there is concern that there may be a lack of clarity if developers have to refer to this PPS, a general NPS and possibly specific NPSs for every scale of development.

### Summary

14. In summary although ENPAA supports the general thrust of the draft PPS in providing a positive policy framework for renewable and low-carbon energy development. There is concern with regard to the potential impact of major renewable and low-carbon energy development both within and on the fringe of National Parks. There is the potential for this development to compromise the objectives of the designation of National Parks.

ENPAA

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