



Department of Energy and Climate Change
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25 January 2011

Dear Sir or Madam

Consultation on Transparency Section of DECC's Business Plan

We welcome the opportunity to comment on the Transparency section of DECC's business plan, including indicators and the information strategy. The English National Park Authorities Association (ENPAA) exists to support the policy making process by helping to coordinate the input of the ten National Park Authorities in England. It is governed by the Chairs of the ten 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.

An important aspect of NPA work is climate change mitigation and adaptation. The role of NPAs in climate change work is set out in the ENPAA publication *Climate Change Mitigation and Adaptation in National Parks*¹, which identifies four key roles. These are sustainable land management, low carbon rural communities, landscape-scale adaptation and communicating climate change. The work of NPAs includes influencing land management to reduce emissions from agriculture and land use, land use change and forestry (LULUCF); helping increase the uptake of appropriate renewable energy and energy efficiency measures to reduce domestic and commercial emissions; and promoting sustainable transport to reduce road transport emissions. In all cases, evidence-based information at a National Park level is important to guide work, assist in prioritisation and monitor success.

National Park Authorities are part of the Defra network and are committed to supporting the Government's transparency agenda. In order to assist NPAs to do this, data relevant to National Parks needs to be provided with a National Park boundary level cut. In terms of data collected by DECC there are three areas of particular interest, namely: (i) renewable energy installation (e.g. installed capacity by type); (ii) energy efficiency installations; and (iii) greenhouse gas emissions.

Many of the impact indicators and additional data sets could be of great use to NPAs and help us fulfil our part in the transparency agenda. Currently data, particularly in the three areas highlighted above, is not generally provided with a National Park boundary cut. Commissioning costly extraction and analysis for each National Park individually is inefficient

¹ Available from <http://www.enpaa.org.uk/enpaa/enpaa-publications.htm>

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and expensive. Also, while data can be cut to National Park boundaries through local arrangements (which are not yet in place for all National Parks), this data does not then have robust comparability with the national data set. Having DECC cut this data for us would avoid such costs and inefficiency, ensure a continuous source of this information and allow comparisons between areas and with the national data set.

The datasets that are soon to be published would add good contextual data to our monitoring and reports if cut to National Park level. They would be of value not just to NPAs but to DECC, other Government Departments and other organisations. It would also assist with DECC's fulfilment of their section 11A/17A duty to National Parks as explained in paragraph 118 of the English National Parks and the Broads Circular 2010². This specifically says, 'as a contribution to the fulfilment of their section 11A/17A duty, but without incurring unreasonable cost, relevant authorities should collect, analyse and update data by Park area'.

We welcome the plan to publish the data on the web to ensure that obtaining data is as straightforward as possible. We would welcome the provision of data in formats that allow users to interrogate the information using their own parameters.

ENPAA is happy to discuss any of the issues raised in this letter with you or provide further information if needed.

Yours faithfully

Paul Hamblin

Paul Hamblin
ENPAA Director

² See <http://www.defra.gov.uk/rural/documents/national-parks/vision-circular2010.pdf>