

Consultation on the UK Renewable Energy Strategy

A joint response by the English National Park Authorities Association (ENPAA) and the Welsh Association of National Park Authorities (WANPA)

September 2008

Summary

1. We welcome the opportunity to comment on the Government's Renewable Energy Strategy. The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the nine English National Park Authorities. It is governed by the Chairs of the nine Authorities, and our response represents the collective view of the Authorities. The three independent National Park Authorities in Wales collaborate as the Welsh Association of National Park Authorities (WANPA). They work together in partnership, and with other external organisations, to promote the interests of Wales' three National Parks. Our response is a joint response and has been prepared by officers, working within the policies established by the National Park Authorities (NPAs). A draft of this response has been circulated to all National Parks in England and Wales. Individual NPAs may submit separate comments, which will draw on the specific issues for their particular region.

2. National Park Authorities are strong supporters of energy efficiency and renewable energy. 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. As planning authorities with responsibility for areas of the highest environmental sensitivity, we are at the forefront in responding to the challenges brought by climate change.

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

- within England, the nine NPAs have used over £710,000 of the Sustainable Development Fund to support 53 renewable energy projects;
- NPAs are using renewable energy to meet their own needs;
- NPAs are commissioning studies, working in partnership with others, and facilitating research into the potential of micro-renewable energy (such as small scale hydro) in protected landscapes; and
- NPAs are granting planning permission for appropriate renewable energy schemes (for example 89% of applications for renewable energy in the North York Moors National Park have been approved since 1997; and 97% within Northumberland National Park).

4. 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. The planning system has an important role to play in directing opportunities and providing the certainty to developers that will influence their investment decisions. We disagree with the perception that planning is a barrier for renewable energy development. Indeed, NPAs invest considerable time in pre-application discussions which seek to reconcile conflicts and encourage appropriate design. Where planning permission is not granted, this is because of justifiable concern regarding the impacts from that development, including on nationally important landscapes.

5. BERR has a duty under the Environment Act 1995 to have regard to National Park purposes when developing policy that might affect them. We would encourage the Government to demonstrate how it has done this in the preparation of the Renewable

Energy Strategy, and during its implementation. One way of doing this would be through the inclusion of a specific box within the final Strategy. This should explain:

- how the preparation of the Strategy has considered the potential effects on National Park Purposes and how these were taken into account in decisions taken;
- reinforce Government policy with regard to safeguarding these highly sensitive areas;
- explain how this will be achieved in the various processes established in the final Strategy; and
- how this will be monitored.

6. Additional points we would urge the Government to address in its final Renewable Energy Strategy include:

- clarity that the Government will aim to adopt a sustainable energy hierarchy which gives priority to reduced energy consumption; greater energy efficiency; and then the development of low carbon forms of energy generation;
- the need to give greater emphasis to small scale micro-renewables and decentralised distribution systems rather than the current focus on large infrastructure;
- priority to be given to the introduction of feed in tariffs that can provide a financial incentive to the development of micro-renewables;
- a target for the development micro-renewables to provide a focus and energy behind the roll out of these technologies, supported by a package of measures to assist delivery;
- an explanation of how the setting of National Parks and other protected landscapes will be protected from inappropriate development and a commitment to prepare a good practice guide on considering planning applications close to National Parks;
- 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 caused by separate consent regimes for energy suppliers and transmission companies by requiring joint applications, EIAs and public inquiries where possible;
- supporting local planning authorities to learn from those exhibiting best practice in encouraging the retrofitting of existing housing stock;
- ensuring local communities have ownership of the energy challenges we face; and energy security is improved through focusing on delivery of renewable energy within the UK rather than in other countries; and
- giving greater prominence to changing behaviour and our patterns of consumption of goods which are resource intensive.

7. Within England, the Chairs of the nine NPAs have approved a formal *Renewable Energy Position Statement*. This is attached to our response as Annex I. This sets out in more detail what National Park Authorities within England are aspiring to; and how they can be helped (including by BERR) in this task.

Joint ENPAA/ WANPA response to detailed questions in the consultation paper

Q2: To what extent should we be open to the idea of meeting some of our renewable energy target through deployment in other countries?

2.1 We believe that the contribution towards the target from other countries should be minimal. This is because:

- of the renewable energy resources that we have within this country;
- the benefits to the UK workforce from a thriving sector within the UK;
- creating a more localised energy supply will improve energy security;
- there are significant issues regarding the development of biofuels in countries with lower environmental standards; and
- relying on other countries weakens the need to ensure local communities take greater ownership in addressing energy problems.

Q3: In the light of the EU renewable energy target, where should we focus further action on energy efficiency and what, if any, additional policies or measures would deliver the most cost-effective savings?

3.1 We believe the starting point for the Government's strategy should be a sustainable energy hierarchy, which considers action to reduce energy consumption; improve energy efficiency; and then develops low carbon forms of energy generation.

3.2 We support focussing further action on energy efficiency, particularly home insulation, energy savings (both at home and in industry), and reducing consumption of goods. The Strategy is for Renewable Energy, but reducing energy use is an essential part of the Strategy and we would like to see more emphasis on this issue. There are a wide range of simple and practical measures that individuals and business can carry out to reduce energy use, but there is a need for on-going promotion and education about these measures and about the environmental and financial benefits.

3.3 The Strategy recognises that saving energy is essential in meeting energy and climate change policy objectives. More emphasis should be placed, however, on changing patterns of consumption and behaviour, and on improving efficiency of products and manufacturing processes.

3.4 Additional incentives are needed for individuals and businesses to improve the energy efficiency of homes and buildings. Financial incentives for homes, in particular, are necessary. The target for non-domestic new buildings to be zero carbon should align with the target of 2016 for domestic new build, with support to achieve this.

3.5 We would like to see further support for community-based renewable energy schemes. The Strategy is focussed on large-scale developments, which require additional associated infrastructure. Smaller, community-scale schemes do not require significant infrastructure development or investment in order to be effective. We also believe that encouraging and emphasis on community-scale schemes will lead to community ownership of energy problems and improved public perception of the benefits of renewable energy developments.

3.6 We support the Carbon Reduction Commitment as it encourages large energy users to reduce their energy consumption. This programme should include a wider variety of organisations, both private and public.

3.7 Government support and incentives for clear spatial planning policies on energy efficiency would also help deliver savings, including by a clearer distinction between what is expected of the planning system and what is the responsibility of Building Regulations. While energy efficiency is often considered in terms of technical specifications and the Building Regulations, the size, location and orientation of new development all affect the opportunities to reduce energy consumption – yet are made during the earlier planning process.

Q4: Are our assessments of the potential of different renewable electricity technologies correct?

Biomass/Hydropower

4.1 Many National Parks have potential for developing both biomass and hydropower schemes. A number of National Park Authorities are either commissioning or facilitating others to undertake feasibility studies into the potential of small scale hydro-power within National Parks. We would welcome measures which assisted in the delivery of these.

Onshore Wind

4.2 We are concerned at the Strategy's proposals for onshore wind development. There are significant planning and environmental considerations that can reduce the overall potential for onshore wind. While we support development of onshore wind power, these should be in appropriate locations that do not detract from areas with high quality landscape characteristics. It is important to assess the capacity of countryside areas for wind power developments.

4.3 There are issues regarding the ability of high quality landscapes, within and outside of the designated National Park boundaries, to accommodate increased wind power developments. We believe that renewable energy in National Parks should be delivered in a way which is consistent with pursuing National Park purposes. Wind power proposals both in and around many National Parks are currently submitted in a piecemeal approach. This, along with potential changes to planning policy may result in any land that does not have a national or international designation being developed with wind turbines. Whilst acknowledging paragraph 14 of PPS22 which states that "...the potential impact on designated areas of renewable energy projects close to their boundaries will be a material consideration to be taken into account in determining planning applications", we believe that greater consideration should be given in practice to the landscape setting of areas with national or international designations. This is particularly true of wind power developments which may have significant visual and amenity effects on those designated areas.

4.4 We believe the Strategy needs to recognise the importance of the 'setting' of National Parks. The landscape setting for a National Park is the area whose landscape character compliments that of the National Park itself, either through similarity or contrast, and in some way supports or enhances its landscape. It is not a simple buffer zone based upon a set distance from the boundary; but will be visible from the National Park. It varies in depth according to the surrounding landscape character area and the topography. Major developments in the setting of a National Park are likely to have landscape effects within the National Park. This will be dependant upon the nature of the development – but needs to be recognised in policy; assessment processes; and decision making.

4.5 Many NPAs are working to assist in providing clarity over the sorts of development that will be encouraged; as well as those that would be considered unacceptable. The Lake District National Park Authority, for example, worked alongside other authorities in Cumbria to prepare a Wind Energy Supplementary Planning Document (SPD). This includes a landscape capacity assessment, and has been adopted by Local Authorities throughout the

County. This SPD provides guidance for planning authorities, developers and local communities, and is the basis for considering any new schemes in Cumbria. We believe the Government should seek to draw on this, and other examples, in order to help clarify the approach to be taken in protected landscapes.

Q5: What more could the Government or other parties do to enable the planning system to facilitate renewable deployment?

Planning is promoting renewables

5.1 The Strategy recognises that a robust planning system is vital to ensuring that the benefits and impacts are all considered when making decisions about new renewable energy developments. While agreeing that the planning system needs to give a positive response to renewable energy proposals if we are to meet national and EU targets it should be emphasised that delays are often the result of inadequate information provided by developers. We also note that in a project lifespan, from conception to final completion, the planning permission process occupies a very small proportion of the total time.

5.2 National Park Authorities are encouraging renewable energy schemes that are appropriate to the highly sensitive environments which they are responsible for. It is important that Government recognises that schemes that are sympathetic to national park purposes are considered within a supportive framework. In Dartmoor National Park, for example, 89% of planning applications for renewable energy have been approved in the last two years. In the North York Moors National Park, the figure permitted between March 1997 – April 2008 is 89%. In Northumberland National Park, 97% of applications for renewable energy have been approved since 1997.

Retaining planning control in nationally protected areas

5.3 We do not support the extension of Permitted Development Rights to non-domestic small-scale renewables. Whilst there is general support in principle for the development of micro-generation technologies in National Parks, and many projects are supported directly by NPAs, there has been an element of concern over the extension of Permitted Development Rights and particularly the proposed extension of Permitted Development Rights for wind turbines. It is considered that the planning system plays an important role in ensuring that renewable energy projects in National Parks are designed and located in a way which is consistent with pursuing the statutory National Park purposes.

Support to planning authorities

5.4 Government could offer support to planning authorities who are promoting renewable energy policies in their Local Development Frameworks, for example, through providing funding for those Authorities or sub-regions who wish to develop Supplementary Planning Documents (SPDs) for specific issues relating to renewables.

Target setting

5.5 Targets are already set in Regional Spatial Strategies, but these mostly do not currently include enough detail on a sub-regional level or include sufficient local information. Targets on their own are likely to be insufficient to see new schemes coming forward. It is likely that identifying targets and assessing the capability of local areas to meet those targets will require significant resources. Recent experience in the North West of England suggests that national and regional targets are not meaningful without an assessment of local variables and without accounting for local information. Should targets be set at any lower level it is crucial that key players in meeting these are identified and that the targets

are not seen as being delivered solely through the planning system as there are many more factors involved in the achievement of them.

Strategic Environmental Assessment needs to be bottom up too

5.6 In many National Parks, development proposals for renewable energy tend to come forward in a piecemeal way. Even with national targets, this is likely to continue. Cumulative effects of proposals and existing developments need to be considered as part of preparing any National Policy Statement. This may be difficult to do in a national Strategic Environmental Assessment (SEA) to accompany the Policy Statement. Any SEA which is undertaken at a national level will need to be supported and take account of local characteristics and differences.

Other aspects need addressing

5.7 We support the suggestion to provide a dedicated advice service to planning professionals and councillors. We suggest that this includes Parish and Town councillors, as the representatives of local communities affected by development proposals.

5.8 We do not believe that planning applications should be processed more quickly at the expense of quality of information and scrutiny of proposals. It is essential to continue to maintain full engagement with communities and affected parties. We are concerned that the proposals to establish an Infrastructure Planning Commission (IPC) may not recognise and incorporate local expertise and democracy in making decisions. We agree with the decision not to lower the current thresholds for renewable energy schemes in terms of those that will be considered by the IPC.

5.9 We are concerned that the proposed National Policy Statements will not have enough regard for local circumstances, local policy and guidance. National Policy Statements will provide clarity for national policy, but it is vital that local variations, local needs and aspirations are considered.

5.10 We would like to see support for developing community based renewable energy schemes. This would promote local ownership of those schemes and improve public perception of them. We have commented on this in more detail in question 6.

Q6: What more could the Government or other parties do to ensure community support for new renewable generation?

6.1 Perceptions of wind farms in particular are often negative, and this is a factor in delaying approval for planning applications. Communities living close to wind energy developments often see the negative impacts on the environment and landscape, and perceive that there are very few benefits or that there are national benefits. Ensuring local communities take greater ownership of both energy supply issues and the need for carbon reduction will be important. We support a move towards a more decentralised system of energy generation and consumption. To be effective, however, any changes in terms of tariffs will need to be accompanied by awareness raising programmes delivered locally into the issues that need to be addressed.

6.2 Linking renewable energy schemes with communities could improve public support for those schemes – providing they are part of a decentralised system. An example would be by calculating the total energy use for a particular community and the energy use per person, and linking energy used to the energy provided by the proposed scheme. People can then associate the benefit from the wind turbines that they can see with the use of televisions, microwaves, lights and other electric appliances.

6.3 We would like to see Government support, through policy and implementation, for community energy schemes. Dedicated advice and financial support could be provided for communities interested in such schemes, along with support for developers to encourage them to partner with local communities. Again, community-scale schemes will not only provide for community energy needs, but will be a link between people's energy use and where that energy is generated. There may also be additional mechanisms that will enable communities to benefit financially from the development of community energy assets. But there should be no compulsion on communities to support renewable developments if there are valid reasons not to do so.

Q7: What more could the Government or other parties do to reduce the constraints on renewable wind power development arising from:

b) environmental legislation?

7.1 We do not agree that there are undue constraints on wind energy development due to environmental legislation. We support the maintenance of environmental standards and the protection of the natural environment. Rather than reducing constraints posed by environmental legislation, we should ensure that renewable energy projects (including turbines) are sited in locations where environmental impacts are avoided and then minimised.

7.2 We agree that clear objectives for management of designated areas are essential. This provides direction and certainty for the managers of those areas, planning authorities and developers. Within National Parks this is already established through National Park Management Plans and Local Development Frameworks.

7.3 It is important to support renewable energy development that does not cause unacceptable harm to the built or natural environment. All proposals for wind energy projects should put forward a sound assessment of the environmental, social and economic effects. Any wind energy developments should be of a scale and design that are appropriate for the location and for the landscape setting of the location. It would be helpful, as stated elsewhere in our response, if the Government cited the statutory purposes and duty of National Parks in the strategy. This can be helpful in ensuring consistency of message to potential developers.

7.4 We agree that developers should provide as much information in applications as possible, and that high quality environmental information should be provided.

7.5 Within England we would welcome Government guidance, through Natural England on assessing cumulative landscape and visual effects of wind energy schemes. We are aware of guidance on cumulative effects prepared by SNH covering Scotland; and there are local examples too (including the Supplementary Planning Documents prepared by some National Parks) which may prove helpful.

Q17: What more could the Government or other parties do to encourage renewable heat deployment with regard to:

a) awareness raising?

17.1 Government should ensure that information is readily available, by providing funding to relevant organisations to do this. Information on practical applications of renewable heat deployment, installation, and where individuals and businesses can find out more are all needed in terms of awareness raising. Government should continue to support regional and local bodies to raise awareness and develop renewable heat schemes. Partnerships between business, local authorities, voluntary groups and communities will be a significant

factor in raising awareness and delivery of renewable heat schemes, and support and assistance for these is essential.

17.2 Government should develop an advisory body to further develop good practice. Such a group could deliver training and advice to all sectors to encourage greater understanding and encourage installation of schemes. An advisory body could also provide funding to develop and promote 'best practice examples' of renewable heat deployment.

d) planning?

17.3 PPS22 already provides support to local authorities to promote renewable heat technologies in LDFs. Other forms of support could include advice, financial incentives and examples of best practice. We agree with the merit of support for developers to choose how to meet the zero carbon standards, although this should primarily be through energy efficient design and insulation.

Q21: If you agree that better information will aid the development of distributed energy, where should attention be focused?

21.1 Information gaps and inaccessibility of information are currently constraints on development of distributed energy and public perception of renewable energy technologies. Better information should be targeted at businesses, schools, community facilities, health facilities, consumers and the manufacturing industry. Increased funding to support community outreach projects, and providing information that is specific to particular sectors – such as householders, manufacturers – is essential to achieving renewable energy targets.

Q22: Do you agree with the Government's current position that it should not introduce statutory targets for microgeneration at this stage in its development?

22.1 Microgeneration is particularly well suited to rural areas and to areas where large scale renewable energy developments are inappropriate due to environmental or social constraints. We would encourage the Government to adopt targets for microgeneration. This would provide a greater focus on this aspect of the energy sector. To be effective, however, they would need to be supported by incentives for industry, communities and households to install microgeneration technologies. We recognise that to do this would require some additional thought as to how progress would be monitored, given that their attainment across a range of micro-renewables would be dependent upon the actions of individual households.

22.2 We believe that community-level schemes should be supported, and that targets will prompt regional and local government to promote such schemes. A positive policy framework and targets to focus future provision will promote microgeneration projects.

Q23: What more could the Government do to incentivise retrofit of distributed energy technologies?

23.1 Retrofitting renewable energy technologies is a key area for increased uptake of renewable energy, but the Strategy does not suggest further action for promoting changes to existing buildings. The majority of buildings in the UK will not be replaced by 2020 or 2050, so retrofitting will achieve significant gains. Financial incentives and ensuring existing guidance and advice is made more accessible for the public are needed to increase the uptake of renewable energy technologies in existing buildings. Local planning authorities could also be encouraged to prepare policy which supports retrofitting. The North York Moors National Park Authority, for example, has adopted Design Guide and Renewable Energy Supplementary Planning Documents which encourage people to consider

renewable energy and energy savings in conversions and when making an application for change of use.

Q27: How can we best ensure that our use of biomass is sustainable?

27.1 It is important that biomass from woodland or crops is sustainable. There is a need to manage the types of crops grown, and ensure that crops are grown in areas best suited to that particular crop. There should be measures in place to ensure that huge growth in commercial forestry, where monocultures are common, is avoided, particularly where this impacts on high value landscapes. Government should encourage increased management and coppicing of native woodlands.

27.2 Biomass crops or woodland should generally be grown close to the renewable energy schemes that they will be used in, to minimise transport fuel and costs.

27.3 In order for biomass from woodland or crops to be sustainable, we need to consider the effects on landscape character, biodiversity and the historic environment, as well as benefits to local communities. Biomass production should not result in a loss of biodiversity, or detract from the character of high quality or designated landscapes.

Q39: Do you agree with our analysis of the likely impacts of the proposed increase in renewable deployment on:

b. the local environment

39.1 We support recognition that there could be impacts upon the environment including landscapes and biodiversity. The Strategy should state that renewables developments will be brought forward in a way which is consistent with protecting and enhancing the local environment and with the aims and purposes of any designations or statutory protection. Indeed it is important to remember that National Parks and Areas of Outstanding Natural Beauty are designated because of their importance nationally (and frequently internationally). It would be inappropriate, therefore, for the Government to view impacts on designated areas and their setting as somehow of local importance.

39.2 CLG and BERR have a duty, as do all public bodies, under the *Environment Act* 1995 to have regard to National Park purposes in making decisions that might affect them. We believe the Government should demonstrate how this has been achieved. In part this could be shown through inclusion of a box in the final Renewable Energy Strategy which explains:

- how the preparation of the Strategy has considered the potential effects on National Park Purposes and how these were taken into account in decisions taken;
- reinforce Government policy with regard to safeguarding these highly sensitive areas;
- explain how this will be achieved in the various processes established in the final Strategy; and
- how this will be monitored.

Q40: What more could the Government or other parties do to ensure the UK meets the EU renewable energy target?

40.1 We agree that it is up to Government – central, regional and local – business and individuals to reduce energy use and to increase renewable energy generation. Individuals and business will need incentives and regulation to make it attractive to change energy consumption and use patterns. There are several changes needed to our existing approach

if we are to meet EU targets. Our comments in this consultation describe some of the areas where we feel additional work is needed.

40.2 There are large gains to be made through reduced consumption of goods, and this appears to have been overlooked in the strategy. Incentives for individuals and business to reduce and re-use goods will reduce the need for energy generation in manufacturing processes. Financial disincentives for consumer goods that generate large quantities of carbon in their manufacture or distribution could also be investigated (such as a tax on those goods, with the revenue from the tax used to subsidise small-scale renewable energy projects or energy efficiency measures).

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