

## **Response to government consultation on the Environmental Report for further onshore oil and gas licensing**

The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. For over 75 years the Campaign for National Parks has been working to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.

Our response focuses on question 2: “Do you agree with the conclusions of the report and the recommendations for avoiding, reducing or off-setting significant effects of the activities that could follow the licensing round? If not, what do you think should be the key recommendations and why?”

We do not agree with all the conclusions and recommendations of the report. In particular, we believe that the government should exclude Article 1 (5) land (National Parks, Areas of Outstanding Natural Beauty (AONBs), SSSIs and World Heritage Sites) and other nationally and internationally designated areas (Special Protection Areas, Special Areas of Conservation and Ramsar sites) from onshore oil and gas licensing.

We have focused our response on the reasons why National Parks should be excluded as this is what our charitable purposes relate to. However, most of the issues covered here are equally applicable to AONBs and many also apply to other types of designation.

We believe that National Parks should be maintained as distinctive and unique tracts of countryside, which are also adaptable and resilient to future pressures such as climate change and that this must be recognised in government policy. The two main reasons for excluding National Parks is that allowing oil and gas licensing in these areas would be inconsistent with existing environment and planning policy and also puts at risk the wide range of benefits that National Parks provide. These are set out in more detail below.

### **Environment and planning policy**

National Parks are our finest landscapes with the highest level of protection. Their statutory purposes as set out in the Environment Act 1995 are:

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

In those cases where there is a conflict and reconciliation proves impossible, the first purpose should take precedence. In pursuing these purposes, NPAs also have a statutory duty to seek to foster the economic and social well-being of communities living within the National Park.

The current government has confirmed the extra protection afforded National Parks under the planning system by setting out in paragraph 115 of the National Planning Policy Framework that great weight should be given to conserving landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty. Allowing oil and gas licensing in these areas would be incompatible with giving great weight to conserving the landscape and would also be contrary to the National Park’s statutory purposes.

It is not unusual for Article 1(5) land to be excluded from proposals that could potentially be damaging to the high quality environment in these areas, for example when new permitted development rights (PDRs) are being introduced. The most recent example of this is the decision to exclude Article 1(5) land from the introduction of PDRs for conversion of agricultural buildings to residential use.

### **The benefits that National Parks provide**

National Parks contribute significantly to the well-being of the nation, through protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. National Parks are also inspiring spaces for people to enjoy and improve their health and well-being, whilst making a significant contribution to the economy through tourism, farming and other related businesses. In 2012, £10.4bn of turnover was generated by businesses in the National Parks in England and employment grew by 2.7%<sup>1</sup>.

The local economy in many National Parks relies heavily on tourism and many visitors are specifically attracted to these areas by the natural beauty of the landscape. National Parks in England and Wales receive a total of 155.8 million visitor days per year and between them these visitors spend a total of £4.5bn per year<sup>2</sup>. This tourism provides a significant amount of employment in the National Parks, for example 15.1% of direct employment in Pembrokeshire results from tourism<sup>3</sup>.

Not only does the high quality environment in these areas make a significant contribution to the tourism economy but it also contributes to a wide range of other objectives by acting as a source of health, well-being and spiritual inspiration. This ranges from tackling climate change and improving biodiversity to enhancing cultural heritage and encouraging physical activity by promoting access to recreational networks.

National Parks are also highly valued by the public. A UK representative survey commissioned by the UK Association of National Park Authorities in 2012 into the awareness and opinions of National Parks<sup>4</sup> found that almost all respondents thought that it was important to protect areas of the countryside from development.

In summary, we believe that National Parks and other nationally and internationally designated areas should be excluded from onshore oil and gas licensing.

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For further information about any aspect of this response, please contact Ruth Bradshaw, Policy and Research Manager (email:ruthb@cnp.org.uk, tel: 020 7924 4077)

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<sup>1</sup> [http://www.nationalparksengland.org.uk/\\_\\_data/assets/pdf\\_file/0007/338362/3209-NPE-INFOGRAPHICweb.pdf](http://www.nationalparksengland.org.uk/__data/assets/pdf_file/0007/338362/3209-NPE-INFOGRAPHICweb.pdf) Westminster Hall debate: Planning Policy and National Parks

<sup>2</sup> <http://www.nationalparks.gov.uk/press/factsandfigures.htm>

<sup>3</sup> Wales Tourism Alliance submission to the Williams Commission, August 2013. This figure is for the County Council area but this coincides closely with the National Park.

<sup>4</sup> MG Clarity, National Parks Survey, UK Association of National Park Authorities, December 2012