



# Energy Infrastructure Policy Position Statement

## Introduction

The Campaign for National Parks is the independent voice for National Parks; a charity that campaigns to protect and promote National Parks in England and Wales as beautiful and inspirational places to be enjoyed and valued by all. It has been in existence for over 75 years.

National Parks are the finest landscapes which have been granted the highest level of protection. The statutory purposes of National Parks are:

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

In those cases where these two purposes are in conflict and reconciliation is impossible, the first purpose takes precedence.

The Broads Authority has a third purpose which is to protect the interests of navigation.

In pursuing these purposes, National Park Authorities (NPAs) also have a statutory duty to seek to foster the economic and social well-being of communities living within the National Park.

Many of our members have wider concerns about the protection and enhancement of the countryside, however our charitable purposes relate specifically to National Parks so that is the main focus for this policy statement. Most of the issues covered are equally applicable to Areas of Outstanding Natural Beauty (AONBs) and some are relevant to the wider countryside.

## Context

The Climate Change Act 2008 commits the UK Government to reducing carbon emissions by 34% by 2020 and 80% by 2050 and the EU Renewable Energy Directive requires the UK to meet 15% of its energy requirements from renewable sources by 2020. As a result, a number of measures have been adopted in recent years aimed at increasing the delivery of renewable energy infrastructure. These include changes to the planning system and the introduction of financial incentives to encourage the installation of wind turbines and other forms of renewable energy infrastructure.

National Parks are rich in many of the natural resources used to generate renewable electricity, particularly wind and water so there will be increasing pressure on these areas to accommodate new energy infrastructure. Some already make a significant contribution, for example the Snowdonia area is already a net exporter of electricity with more than 20 hydro power stations, including Dinorwic and Ffestiniog, generating more than 2000 MW<sup>1</sup>. In addition, other power stations located in or close to National Parks, such as the Wylfa Nuclear Power Station near Snowdonia National Park require connections to the grid that are sometimes routed through the National Park. Some such power stations and the associated electricity transmission lines existed before the parks were designated but there are currently a number of proposals for new grid connections which could affect National Parks, in particular those needed to transmit the electricity generated by offshore wind turbines.

National Parks also play an important role in mitigating climate change as they are generally rich in peat, trees and other vegetation, all of which have the potential to act as major carbon sinks. Upland landscapes, in particular, are very important for the sequestration of carbon. Nearly half of all soil carbon within Wales is locked up in upland and grassland areas, much of which is located within National Parks and half of England's total upland areas are found within National Parks. Significant areas of the National Parks are also covered in woodland, another important source of carbon storage, for example around half of the total area of the New Forest is woodland.

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<sup>1</sup> [http://www.eryri-npa.gov.uk/\\_data/assets/pdf\\_file/0010/37369/energy.pdf](http://www.eryri-npa.gov.uk/_data/assets/pdf_file/0010/37369/energy.pdf)

The UK Government has published an action plan<sup>2</sup> which sets out the eight technologies with the greatest potential to help the UK meet the 2020 target of 15% renewable energy. This identifies energy from wind (including offshore wind power), biomass and heat pumps as the leading contributors.

Whilst much of the focus is on increasing the amount of renewable energy, other key drivers for UK energy policy are reducing fuel poverty, increasing security of energy supply and enhancing energy efficiency.

In December 2012, the UK Government lifted restrictions on the use of fracking, a method of extracting gas from shale rock, on the basis that this would increase the security of our energy supply. However, a significant increase in the use of gas would be incompatible with meeting climate change targets and there are a number of other environmental concerns about the use of fracking. There is still much uncertainty about how much of the UK's shale gas is technically recoverable and there have not yet been any proposals for fracking developments in National Parks.

Energy policy is not a devolved matter but many enabling policies such as planning and economic policy are. Decisions on nationally significant energy infrastructure are made by the National Infrastructure Directorate based on the National Policy Statements for Energy which were agreed by the UK Government. The Welsh Government shares the UK Government's commitment to meet the 2020 target but would like greater responsibility for decisions on major energy infrastructure in Wales. There are now a number of differences in the planning regime for energy infrastructure in the two countries. For example, Wales now has different permitted development rights for wind turbines associated with domestic buildings and a different approach to identifying areas which are suitable for large-scale wind farm development.

### **What is our position?**

The Campaign for National Parks aims to protect and enhance National Parks by strengthening the support they receive and challenging the threats to them. Foremost among the current threats is climate change which will have a major impact on the wildlife and landscape of the National Parks as well as the livelihoods of those who live in them. So we broadly support the strategy set out in the Climate Change Act 2008 to mitigate and adapt to climate change. We also want to promote a greater understanding of National Parks by demonstrating the benefits they can bring to society.

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<sup>2</sup>[http://www.decc.gov.uk/en/content/cms/meeting\\_energy/renewable\\_ener/re\\_roadmap/re\\_roadmap.aspx](http://www.decc.gov.uk/en/content/cms/meeting_energy/renewable_ener/re_roadmap/re_roadmap.aspx)

We recognise that National Parks have a key role to play in delivering the types of energy infrastructure that will be required to meet the UK's targets for carbon reduction and renewable energy supply. The challenge is to do this by introducing only infrastructure which is appropriate in scale and design for such a setting so as not to damage the landscape, tranquillity and character of these protected areas.

Much of the pressure for new energy infrastructure results from the UK's growing demand for energy so energy conservation and energy efficiency also have a crucial contribution to make.

Our position is that:

- The UK's energy policy should be based on an energy hierarchy where the first priority is energy conservation, the second is energy efficiency, the third is exploitation of sustainable, renewable resources and the fourth is exploitation of non-sustainable resources using low-carbon technologies and the lowest priority is given to conventional exploitation of fossil fuels<sup>3</sup>.
- The priority in National Parks, as elsewhere, should be measures that conserve energy and lead to more efficient use of energy.
- National Parks should be exemplars in delivering renewable energy solutions that do not compromise landscape, heritage and biodiversity and should aim, as far as possible, to meet their own energy needs from appropriate renewable energy sources. These include: small scale hydro, biomass (wood and short rotation crops), anaerobic digestion plants, appropriately scaled and located wind turbines plus domestic scale installations (e.g. micro combined heat and power, heat pumps, solar power).
- Renewable energy developments within National Parks should only go ahead if they are of an appropriate scale and should be located in such a way as to minimise their visual and environmental impacts. Particular care should also be taken over the cumulative impact on the landscape from a proliferation of small scale renewable energy schemes, in particular wind energy developments.

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<sup>3</sup> For more information on an energy hierarchy, see

<http://www.imeche.org/knowledge/policy/energy/policy/the-energy-hierarchy>

- There should be no new major power generation projects or transmission routes in National Parks.
- Proposals for any new energy infrastructure in areas immediately outside National Parks (including offshore) should take account of the impact on the National Park setting.
- New grid connections should avoid National Parks but where it is essential for the route to pass through, or adjacent to, a National Park it should be placed underground or under sea.
- Where existing grid connections in National Parks need to be replaced, the new lines should be placed underground.
- The visual amenity allowance introduced by Ofgem to fund the undergrounding of existing electricity distribution lines should continue. The equivalent allowance introduced recently for electricity transmission lines should be doubled to £1bn in line with National Grid's research findings.
- Policy on energy and related issues such as planning for both the UK and Wales must take account of National Park purposes and the extra protection afforded these areas. In general National Parks should be exempted from permitted development rights granted for renewable energy infrastructure which is likely to have a significant impact on the landscape, such as wind turbines.
- The policies of National Park Authorities (NPAs) should support energy efficiency measures that are appropriate for a protected landscape. We would also like to see NPAs undertaking some form of capacity study in partnership with neighbouring local authorities to identify where different types of energy infrastructure could be located and the scale at which it would be appropriate, similar to the Renewable Energy Assessment that Pembrokeshire Coast NPA has already undertaken.

- We support financial incentives (grants, payment tariffs, green taxes and charges), policies and strategies that assist in the adoption of low carbon technologies and/or penalise unsustainable practices but these must be developed and delivered in a way that does not result in perverse incentives for land-owners to install inappropriate infrastructure purely for financial gain.
- There should be more research into new forms of renewable energy which may be appropriate in National Parks, such as the current pilot to test the potential for underwater tidal energy generation in Pembrokeshire.
- We would not support the use of fracking in National Parks, given the potentially significant environmental impacts, including the landscape damage caused by the large number of boreholes required to recover shale gas and the fact that increased reliance on gas risks undermining the UK's progress towards meeting climate change targets.

### **How can we make this happen?**

There are two main ways that the Campaign for National Parks can influence the types of energy infrastructure in National Parks – through the planning system and through the policies and strategies which impact on the delivery and funding of new infrastructure or changes to existing infrastructure. The latter is particularly important with regard to the removal of pylons and the undergrounding of existing electricity lines. We will continue to respond to relevant consultations and take up opportunities to influence policy and practice in these areas.

In particular, we will:

- Respond to consultations on changes to planning policy in England and/or Wales which have implications for energy infrastructure in National Parks. Recent examples include the National Policy Statements for Energy.
- Lobby for changes that are needed to existing planning policy. Recent examples include pressing the Welsh Government to exempt National Parks from the permitted development rights which allow wind turbines up to 11.1m to be built without planning permission.
- Respond to consultations from National Grid relating to new grid connections which have major implications for National Parks. Recent examples include the North West Coast Connections consultation for Cumbria.

- Play an active role in the Ofgem Price Control Review Forum and related working groups to ensure the successful continuation of the visual amenity allowances for both distribution and transmission lines.
- Work closely with National Grid and other stakeholders to develop an appropriate prioritisation process for the new allowance for transmission lines and to push for this allowance to be increased.
- Seek to ensure that National Park Management Plans and Local Plans include strategies and policies which encourage the development of small scale renewable energy infrastructure and promote energy efficiency measures.
- Respond to planning applications and development consent orders for major energy infrastructure developments in line with our planning casework criteria. This could also include major proposals outside National Parks if they have significant impacts on a National Park. Recent examples include the Atlantic Array development promoted by RWE npower renewables.
- Maintain ongoing dialogue with relevant Corporate Forum for National Park members (National Grid, Northern Powergrid and RWE npower).

## Case studies of appropriate energy infrastructure in National Parks

Ellergreen Hydro is now operating five hydro power schemes in the Lake District National Park, providing power for the equivalent of over 1000 people (about 2.5% of the National Park's population). Many more are planned and the company aims to be providing power to 15% of Lakeland's residents by the end of 2013. All Ellergreen's installations involve low profile weirs, buried pipelines and small, traditionally styled buildings housing the turbines. For an example of one of their projects:

<http://www.gilkes.com/page/103/Logan-Gill-Case-Study.htm>

Snowdonia NPA have recently spent about £420,000 installing a small scale hydro-electric scheme at Plas Tan y Bwlch (the NPA's study centre) which is due to start generating electricity in the next few months. It will provide enough energy for about 14 houses and will have paid for itself in 10 years at current electricity prices.

<http://voff-snowdonia.blogspot.co.uk/2012/08/power-of-plas.html>

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