
CAIRNGORMS NATIONAL PARK AUTHORITY

FOR DISCUSSION

Title: ENERGY IN THE PARK: TOWARDS A LOW CARBON NATIONAL PARK?

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Purpose

To consider setting an ambition for the Cairngorms to be a Low Carbon National Park, the scope of CNPA's work on energy, the content of the supplementary guidance on energy.

Recommendations

That the Board consider the discussion points and provide a steer for further development on:

- a) Setting an ambition for the Cairngorms to be a Low Carbon National Park;
- b) Refining our energy policy objectives;
- c) Scoping the supplementary guidance on energy generation;
- d) Other roles to achieve our energy objectives;

Executive Summary

There are clear and ambitious national policy targets emerging in relation to climate change, energy and a low carbon economy. There are several strands of work underway in the Park relating to these ambitions and the overarching goal of sustainability, but at present these efforts lack a focal point around which to co-ordinate workstreams and around which to build further support, profile and action with partners.

The Board are therefore asked to consider setting out an ambition for the Cairngorms to become a Low Carbon National Park – setting a tangible focus to co-ordinate existing work to better effect and stimulate new efforts within CNPA and partners.

Within this context, there is a pressing need to progress CNPA's work on energy policy, support and guidance. Since the objectives for energy in the National Park Plan were established, the context has developed rapidly, and greater clarity on our rationale and principles relating to energy generation and use is required – particularly in relation to impacts and benefit. The second section of the paper seeks a steer from the Board on these issues.

One of the key tools to implement our policies on energy will be the supplementary guidance accompanying the Local Plan. The third section of this paper sets out the purpose and scope of this guidance for discussion.

Finally, supplementary guidance should be one part of a co-ordinated set of workstreams providing active support and guidance to help deliver the energy policies for the Park – the fourth section of the paper identifies for discussion the other roles that CNPA and partners have, specifically research and fact-finding, awareness and advice, support and facilitation and demonstration.

ENERGY IN THE PARK: TOWARDS A LOW CARBON NATIONAL PARK? - FOR DISCUSSION

Background

1. This paper seeks a steer from the Board on developing our sustainability focus and within that context, the principles and scope of CNPA's work on energy. First the paper invites members to take a step back to the bigger picture of sustainability in order to set a clear context for our work on climate change and energy. Secondly, the paper goes on to consider the scope and principles of our work on energy in particular. The discussion will directly inform the development of supplementary planning guidance on energy, but also the wider scope of work in which CNPA engages on energy generation and use.
2. The Climate Change (Scotland) Bill current before Parliament would set out a target of an 80% reduction in greenhouse gas emissions by 2050, with an interim target of a 50% reduction by 2030. If passed, these targets are likely to lead to challenging policies for emissions reduction across sectors. The 80% target is built into the Scottish Government's Economic Strategy, in which renewable energy is identified as a key sector in the economy.

Towards a Low Carbon National Park?

3. CNPA has set out a clear desire to help partners address climate change in the Park – focused on mitigation, adaptation and awareness. There is a significant level of activity both within the work of CNPA and across the work of partners delivering the National Park Plan. The Board has previously identified that CNPA's role could most usefully be as a point of co-ordination and communication, bringing work together to give climate change a high profile and to maximise the benefit of the work undertaken by a range of partners and communities in the Park. We are now at the stage where there is a wide range of projects related to climate change and its broader context of sustainability underway, but it would help to have a clearer statement of our ambition around which to focus activity and generate a collective sense of direction.
4. It may now be an appropriate time to set out a clear ambition to become a 'Low Carbon National Park'. This would provide a clear statement of motivation for work on energy and wider work in a range of areas. It would also be a clear statement positioning sustainability at the heart of the management of the National Park. The aims of the National Park set a clear framework for sustainability, in which the Board has focused particularly on climate change as a key message. Setting an ambition for a low carbon National Park would provide a more robust and tangible focus around which to garner support and action on climate change and sustainability.
5. A Low Carbon National Park - what does it mean? There is a recognition in government policy that a low carbon economy is likely to increase the resilience of the economy and communities in a period of climate change and increasing resource scarcity. In essence, a low carbon National Park means one in which carbon

consumption and emissions are minimised – across all sectors including land-use, buildings, energy, transport, waste.

6. There are many debates of terminology over carbon neutral, zero carbon etc. English National Park Authorities have committed to be ‘carbon neutral’ in their operations by 2012. While carbon ‘neutrality’ may be possible in relation to an organisation’s own activities, it is unlikely to be a practical target for the area of the National Park which is a very open system in terms of its economic and resource flows.
7. As a headline ambition, a low carbon National Park provides a clear direction and focus around which to engage partners and support for a range of work. It provides a way to bring together strands of work in different areas into a more co-ordinated and more robust approach to sustainability.
8. A headline ambition of a low carbon National Park would enable us to build on the following areas of current work in a co-ordinated way:
 - a) Low carbon land management – current work includes feasibility studies of low carbon infrastructure on estates, research into land capability for carbon capture, muirburn effects on carbon and low carbon farm management. This area of work has already been identified as one for further development and co-ordination, and discussions on a substantial low carbon land management project are underway with a range of partners including the Macaulay Institute.
 - b) Transport – Accessible transport is required for sustainable economic and social development. Fossil-fuelled vehicles cause pollution; our actions seek to reduce the amount of car use and encourage walking, cycling and public transport. The Heather Hopper fills a gap in bus services across the Park; the Cairngorms Explorer brochure encourages non-car modes to get to and around the Park. To highlight alternatively-fuelled vehicles CNPA are co-funding a community pool electric vehicle as a partner in the EU’s Northern Periphery Programme’s Clim-ATIC project. We also undertake research on transport patterns and demand. We are conducting a transport review this year which should capture and assess the range of work already underway.
 - c) Waste – to date CNPA has been involved in low level waste awareness and recycling work. The Corporate Plan achievement to get more businesses to develop environmental management plans provides some current impetus to take this forward. Possible joint work with the Business Environmental Partnership includes a specific project for the Park, perhaps using key businesses/organisations as exemplars - demonstrating financial savings, or business opportunities is key.
 - d) Renewable energy support – the focus has so far been on woodfuel but micro-hydro, wind and biogas may all have a role, at varying scales. We are working with Scottish Enterprise and LL&TNP to develop joint project work, particularly demonstration projects. A community based scheme, a public organisation and a private business example would provide a good mix to demonstrate what is possible.
 - e) Climate change awareness – the National Park is an excellent place to communicate the effects of climate change on both the environment and the

economy, and current work such as Clim-atic, and work with SEARS partners is seeking to use its potential to engage.

- f) Planning – Current work involves developing a suite of policies contained within the Local Plan (and subsequent Local Development Plan), and associated supplementary guidance which together provide a framework for taking forward low carbon development in the Park. These policies and guidance deal with issues such as sustainable design, carbon emissions from new development, and energy generation. All these elements tie together to form a cohesive and comprehensive framework for anyone wanting to develop in a way which moves towards a low carbon Cairngorms National Park.
 - g) Organisational ‘Greening’ – there is a range of internal CNPA work on improving our own environmental performance. Our most significant KPI target is to reduce carbon emissions from vehicle based business travel by between 2%-3% per annum. This KPI is a proxy KPI designed to measure our overall commitment to reducing business impact. For 2008/09 our total mileage reduced by 2.8% to 210,416 miles (from 216,458). Emissions reduced by 5.4%, from 57.1 tonnes to 54.0 tonnes.
9. These examples show a significant amount of work underway on a number of sustainability threads, but it is increasingly apparent that this work could add up to significantly more if there is a headline ambition around which to co-ordinate it and build further support amongst partners.
10. We should appreciate though, that committing to a low carbon National Park ambition would have significant further implications for the way in which CNPA operates and the way in which delivery of this National Park Plan and development of the next plan moves forward, including:
- a) Stepping up CNPA’s own organisational sustainability behaviour – to be a credible leader CNPA should set a clear example in its own activities which is likely to mean revisiting our greening agenda and considering how we go about our business.
 - b) Influencing the priorities for CNPA’s corporate and operational planning.
 - c) Influencing the priorities for effort on current National Park Plan outcomes.
 - d) Helping to shape the next National Park Plan and Local Development Plan – a low carbon National Park could become one of the main themes of the plan around which to build policy, support and action.
11. This paper does not address all of these themes of work, and the scope and monitoring of a low carbon National Park ambition will need to be significantly developed through a number of work streams. This paper is the first step in a discussion of the principle, from which the Board can provide a steer on if and how this should be developed further.

Discussion Point 1: Should CNPA move towards a clear ambition for the Cairngorms to become a ‘Low Carbon National Park’ as a focus around which to engage support and shape delivery?

Energy

12. In responding to national policy to reduce greenhouse gas emissions, and implement the National Park Plan and Local Plan effectively, there is an urgent need to progress work on energy – on the advice, guidance and support that CNPA and partners are able to provide. There are already national policy targets bringing a high profile focus on renewable energy generation, and on changing behaviours in relation to energy use and demand, generally articulated through a climate change agenda.
13. To date, policy discussions have revolved around renewable energy generation, although there are other technologies and work on energy demand and use that can contribute to reducing carbon emissions. In scoping the planning guidance and wider work, it would there fore help to set out clearly CNPA’s motivation for work on energy.
14. There appear to be three motivations for CNPA’s work on energy:
 - a) Sustainability – with or without the headline ambition of a low carbon National Park, in order to deliver the four aims of the Park collectively, sustainability is a key driver for our work on energy – to reduce carbon emissions through energy generation and use, contributing to national targets
 - b) Economic opportunities – renewable energy generation offers income generation opportunities particularly for land-based businesses and communities. There is also significant fuel savings potential through reduction in energy use and demand.
 - c) Effective planning and development – CNPA needs to guide and assess proposals for energy infrastructure and reduce the demand and use of energy through the planning and development system to ensure they are consistent with the aims of the Park.

What do we want to see?

15. The National Park Plan includes two strategic objectives for energy:
 - a) Contribute to national targets for greater renewable production through increasing community, business and domestic scale renewable energy schemes;
 - b) Help communities, businesses and households to obtain the information, expertise and support they need to reduce energy consumption and increase renewable generation.
16. Since the plan was developed, the wider policy context has developed rapidly and there is a need to refine and clarify our ambitions in relation to energy in the Park, particularly in relation to impact and benefit.

Impact

17. The National Park Plan refers to ‘community, business and domestic scale’. There is a risk of confusion in reference to scale, and what is actually important – both in planning terms and in our wider support and guidance. Development of the Local Plan has led to a clearer focus on impacts – rather than the scale of power output. It would therefore be more appropriate to frame our policy and guidance in terms of assessing the impacts of a proposal (of whatever scale). Equally, the type of developer or motivation for development (community, domestic, business), or

attempts to distinguish 'commercial' from 'community' are not relevant to planning guidance, or to an objective assessment of impacts. Further consideration of the scope of assessing impacts is detailed below under the planning guidance section.

Community Benefit

18. We have identified economic opportunities for communities through renewable energy generation, and the National Park Plan and other guidance encourages 'community' energy projects. In order to do this, we need to be clearer in what we mean by community benefit, specifically:
19. Do we want to encourage communities to generate electricity 'off-grid' for local use, thereby providing direct benefit and reducing energy bills? If so, is that a realistic objective in terms of infrastructure?
20. Do we want to encourage communities to generate electricity for sale into the grid, thereby providing financial benefit? If so, what are the infrastructure implications – for example would it reduce the likelihood of removing potentially redundant overhead lines considered during the Beaulay-Denny public inquiry – and are there good enough development models to return sufficient community benefit?

Discussion Point 2: The Board are asked to provide a steer on refining our policies in relation to impacts and community benefit.

Supplementary Guidance on Energy Generation

Background to Supplementary Guidance (SG)

21. A suite of supplementary guidance is being prepared to amplify the policies contained in the local plan. Board members have had a series of updates on progress being made on the various pieces of guidance currently being prepared.
22. The Local Plan contains a number of policies which relate to the minimisation of impacts from development on climate change, and a number of these policies will be accompanied with their own pieces of supplementary guidance. Once completed, the suite of supplementary guidance will be able to be read as a whole along with the Local Plan, to assist anyone wanting to develop within the National Park.
23. Specifically related to the SG on energy generation are the Sustainable Design Guide, and the SG on carbon emissions from new development. The SG on energy will not repeat guidance and advice set out in the other SG being produced, but will be read in conjunction with these other documents.
24. The SG on energy generation relates specifically to Policy 16 in the Local Plan on Energy Generation.

Purpose

25. The purpose of the SG on energy generation is primarily to support Policy 16 of the Local Plan which sets out the issues to be considered when planning any energy generation related development. The guidance will highlight the issues everyone will have to consider when looking at energy generation, it will then set out more detailed guidance on the types of technologies available, and finally it will provide a

spatial framework which gives guidance on what types of energy related development will be most appropriate at different locations within the National Park.

26. The principles underpinning the guidance are in line with those already agreed for other pieces of SG, and as such the guidance will be Cairngorms specific, concise, customer focused, able to be understood by professionals and lay people alike, and with a robust status.

Scope

27. In order to remain as concise as possible, the energy generation guidance will not address issues that have already been covered by the Sustainable Design Guide and the separate guidance on Carbon Emissions from new development. The scope of Local Plan policy 16 frames the scope for the guidance on energy generation, but the guidance also provides an opportunity to state basic principles about minimising the use and need for energy in the first place, to ensure the guidance complements other sets of guidance.
28. In order to provide the most appropriate and helpful advice within the National Park, the guidance will be based on consideration of the impacts of any proposed development, and not the output of the technology being proposed.
29. Initial plans for the layout of the guidance are to split it into 2 distinct parts.
30. Part One will develop a set of key principles to be considered, such as:
 - a) supporting a diverse range of technologies;
 - b) recognising the importance of fully engaging with local communities and other stakeholders at all stages of the planning process;
 - c) guiding development to appropriate locations;
 - d) providing clarity on the issues that will be taken into account when assessing specific proposals; and
 - e) maximising the benefits of the development by seeking to achieve all 4 National Park aims collectively.
31. It will go on to include details about the types of technologies available, and what needs to be considered when looking to develop them in the Cairngorms. It will not repeat advice available elsewhere, but will signpost readers to other sources of information.
32. Part Two will provide a more detailed spatial approach to locations for development. It will provide a framework which gives guidance on the suitability of different types of energy generation in different parts of the National Park.
33. The methodology that will be developed and the content of the section will be heavily influenced by guidance from the Scottish Government and best practice examples from elsewhere.
34. A wide variety of issues will have to be taken into account, and although the following list is not exhaustive, it gives a flavour of the range of issues that will be addressed:
 - a) Impacts on natural heritage

- b) Carbon emissions
- c) Project viability
- d) Availability of resource
- e) Site access
- f) Ground suitability
- g) Grid capacity
- h) Transportation issues
- i) Fisheries
- j) Amenity

Discussion Point 3: Do the purpose and scope set out here provide the right basis on which to proceed with development of the supplementary guidance?

What other roles does CNPA have?

35. Supplementary Guidance should be part of a wider co-ordinated approach to guiding and supporting energy generation and use in ways that meet the four aims of the Park. Other roles for CNPA and partners are identified here, and are relevant to the wider aspirations of a low carbon National Park, as well as energy in particular. Further consideration of these roles will shape future operational and strategic plans.

Research and fact-finding

36. *Suggested role* – to identify what information is available, draw together existing sources and identify gaps in relation to Park specific needs.
37. *Target groups* – this is a first step in order to engage effectively through other roles identified.
38. *Examples* – identifying existing research on carbon management, guidance on particular technologies; identifying what people want to know; the barriers to take-up of low carbon technologies.

Awareness and advice

39. *Suggested role* – to signpost and promote sources of advice, support and funding, in ways that can be easily picked up and shared.
40. *Target groups* - individuals, businesses, house-builders
41. *Examples* – recent work signposting communities to the Climate Challenge Fund including seminars in the Park and ongoing advice; awareness raising strands in the woodfuel action plan; signposting work to accompany implementation of the sustainable design guide and other planning guidance.

Support and facilitation

42. *Suggested role* – to support and facilitate firstly the development of low carbon energy generation in ways that are consistent with the aims of the Park, and secondly reductions in energy demand and use.

- 43. *Target groups* – land-based businesses, communities
- 44. *Examples* – current work on woodfuel and low carbon estates project which is funding initial feasibility studies; expansion of tailored funding sources to support feasibility phase of development; pro-active guidance on suitable sites for renewable energy generation; potential support for household retro-fitting.

Demonstration

- 45. *Suggested role* – to identify, support and promote a network of demonstration sites that show
 - a) how low carbon energy generation can be done well in ways that are consistent with the aims of the Park;
 - b) practical measures to reduce energy demand and use.
- 46. *Target groups* – land-based businesses, energy producers, communities, individuals, house-builders
- 47. *Examples* – demonstrations of run-of-river hydro schemes, woodfuel installations, household scale measures, all linked to provision of information, guidance and sources of support.

Discussion Point 4: Do these roles provide the right focus for CNPA's work on energy?

Consultation

48. This paper has been prepared through internal discussion between the Planning and Development Management, Economic and Social Development and Heritage and Land Management teams within CNPA. It draws on discussions with partners during recent months in connection with renewable energy support in particular.

Policy Context

49. The Scottish Government and National Park Plan policy context are identified in the early sections of this paper.

Delivering Sustainability

50. The rationale behind adopting a low carbon National Park ambition is to provide a focus for a range of sustainability work in a way that allows us to build on what is already happening, and co-ordinate a higher profile focus on sustainability.

Delivering A Park for All

51. There are no direct implications on a Park for All, although a significant aspect of energy policy relates to fuel cost savings and consideration should be given to ensuring disadvantaged groups are included within the scope of energy reduction work.

Delivering Economy, Effectiveness and Efficiency

52. The suggestion of a low carbon National Park ambition is a way to draw together more effectively and efficiently a range of workstreams relating to sustainability in order to increase the impact and value of that work. The supplementary guidance on energy seeks to provide a concise and helpful guide to enable good development.

Implications

Financial Implications

53. There are no direct financial implications arising from this paper. The existing workstreams referred to have existing budget allocations within the current operational plan, and future workstreams will be considered in the normal operational planning process for future years. If we do choose to make work on a low carbon National Park a particular priority, then it may mean a redistribution of financial resources around Park Plan priorities.

Presentational Implications

54. This discussion on a potential low carbon National Park focus is in the early stages and would require further development before any significant public presentation. If we indicate we do intend to adopt that ambition, it provides a good presentational focus around which to build the support of partners in a co-ordinated way. The supplementary guidance on energy will be subject to consultation and will be published as part of a suite of supplementary guidance to accompany the Local Plan.

Implications for Stakeholders

55. The supplementary guidance should provide greater clarity on CNPA's energy policy in the Local Plan and a helpful guide for developers and individuals. The broader work around a low carbon National Park would start to shape the work of partners delivering the Park Plan over the next few years, and be a significant factor in shaping the next National Park Plan.

Next Steps

56. The supplementary guidance on energy will be developed and further updates on its progress will be brought to the Board through the existing arrangements for updating on the wider range of supplementary guidance.
57. If the Board indicate that in principle, we should set out an ambition to be a low carbon National Park, the scope of this work and priorities needed to take that forward will be developed further. A paper seeking the Board's decision on the scope of that work would be brought to the Board later in the year, to be co-ordinated with the start of the process to develop the next National Park Plan.

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