



WWF *for a living planet*

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PARLIAMENTARY BRIEFING

Draft National Policy Statements on Energy

SUMMARY

- WWF believes the new planning system for nationally significant infrastructure projects (NSIPs) must deliver a framework for sustainable development and facilitate a shift towards a low-carbon economy.
- WWF believes the draft National Policy Statements (NPSs) on energy fall short of developing this framework, as they fail to provide the appropriate level of detail to allow the Infrastructure Planning Commission (IPC) to make sound planning decisions.
- Given the importance of NPSs in the new planning system, WWF believes that they should set out a vision for future sustainable infrastructure development in the UK, how much is needed, and where.
- There are a number of reasons why WWF believes that these documents are not fit for purpose as planning documents.

In particular:

- The stakeholder and public participation process has been inadequate and disproportionate given the significance of the NPSs
- The Appraisals of Sustainability, incorporating Strategic Environmental Assessment, do not comply with the requirements of the SEA Directive
- The NPSs lack a spatial dimension to guide suitable siting of developments
- The NPSs do not include a remit for the IPC to consider the carbon impact of developments and to refuse applications for carbon intensive infrastructure
- The NPSs establish unlimited need for all forms of energy infrastructure, which takes precedence over the economic, social and environmental impacts

Background

WWF agrees with the principle of creating a national policy framework for the development of major infrastructure, in both the marine and terrestrial environments. WWF believes that this could be an opportunity to develop a proper strategic framework for implementing the ecosystem approach in decision-making and to ensure a successful transition towards a sustainable, low carbon economy.

It is our belief however that the statements published so far fail to provide a satisfactory framework to guide proper planning decisions by the Infrastructure Planning Commission (IPC). The IPC will have a difficult balance to strike, so it is essential that the NPSs include the appropriate level of detail to allow the IPC to make decisions that are legally right.



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WWF's concerns with the draft National Policy Statements (NPSs) on energy:

There has been poor stakeholder and public participation. The drafting of the NPSs and the environmental assessments were undertaken in isolation from wider stakeholder and public participation, which has restricted early identification and resolution of issues and suitable testing of evidence, assessment process and the draft NPSs. Undertaking effective environmental assessment requires time and resources invested early in a 'receptive' planning process to avoid the unnecessary expenditure and delay in the process later on. The more consultation is constrained the more likely it is that people will seek recourse through legal challenge, ultimately resulting in even further delays in implementing the new planning system.

The Appraisals of Sustainability, incorporating Strategic Environmental Assessment, are inadequate. A study undertaken by Collingwood Environmental Planning for WWF and RSPB¹ concluded that the quality of assessments was variable, but often poor and in some cases had critical failings. In particular, the narrow framing of objectives for the draft NPSs meant that the Appraisals do not properly consider reasonable alternatives, such as different technology mixes, and do not adequately assess the cumulative effects of infrastructure development on the environment.

The draft NPSs lack a spatial dimension to guide suitable siting of developments. Proper consideration of spatial elements and integration between NPSs, as well as with the existing planning system, is needed to provide a vision of how future infrastructure development will occur and where. The draft NPSs also fail to provide guidance on how competing uses of space should be managed. WWF believes it is essential that the NPSs assist the IPC in determining the most suitable locations for infrastructure.

The draft NPSs do not give the IPC remit to consider the carbon impact of developments. WWF finds it worrying that the draft NPSs advise the IPC to **disregard** aspects of the Government's energy and climate change policy merely because it is not the primary delivery vehicle. The developments approved by the IPC will have a major impact on the UK's ability to meet its carbon budgets and renewable energy targets. WWF believes that if the IPC is to make decisions that contribute to implementing the Government's vision for a low carbon future, it must take into account the carbon and climate change impacts of each development. The Environmental Audit Committee's January 2010 publication on Carbon Budgets echoed WWF's concerns that 'each of the IPC's planning decisions will have to be made with the imperative in mind that we must keep within our carbon budgets and it is the sum of all its decisions that will shape our emissions pathway.'²

The draft NPSs set out a statement of unlimited need for all types of energy infrastructure. WWF believes it is unhelpful not to quantify the varying needs for different energy infrastructure types in a planning context; but simply to assume, as the draft NPSs do, an unlimited need over time for *all* energy infrastructure. Inevitably this will lead to planning policy based on a form of the discredited "predict and provide" approach; giving need for energy infrastructure disproportionate weight against social and environmental impacts. WWF disputes the assertion that there is significant urgent need for the development of *all* types of energy infrastructure, despite the fact that there will be closures of existing plant. A report from energy consultant Pöyry, which assumed no new gas plants were built other than those under

¹ 'Appraisals of Sustainability and the New National Policy Statements: Opportunities Missed and Challenges to Come?', Collingwood Environmental Planning, January 2010

² 'Carbon Budgets', Environmental Audit Committee, HC 228-1, 5 January 2010

construction by July 2008, showed that there would be no 'energy gap' if the renewable energy and energy efficiency targets we have already committed to were met³.

The Government is currently drafting a draft Marine Policy Statement (MPS) in accordance with the Marine and Coastal Access Act 2009. WWF therefore seeks reassurance from the Government that the development of the MPS will improve on the process undertaken for the draft NPSs.

WWF believes an effective planning system should have:

- Consultation processes that are open and fully participatory (in accordance with the provisions of the UNECE Aarhus Convention on public participation in environmental decision-making) and help to resolve disputes/conflicts at an early stage;
- Adoption of an ecosystem approach within the NPSs and IPC decision making processes, such that infrastructure development, biodiversity and ecosystem conservation, community wellbeing and prosperity and economic growth are properly weighted and considered to ensure development within environmental limits;
- NPSs that are robust planning documents which provide the IPC with the best possible framework, guidance and criteria for considering applications and achieving sustainability, and which have been developed following environmental assessments that are fully legally compliant;
- A clear assessment of the carbon impacts of every proposal before the IPC, and the IPC must have a remit to refuse a development that is likely to push the UK beyond its carbon budgets, based on advice received from the Committee on Climate Change;
- A strong working relationship between the IPC and the MMO on applications related to the marine environment.

Conclusion

WWF believes that if the draft NPS were adopted in their current form, there would be a long-term corrosive effect on the environment and on public confidence in the system. WWF therefore asks the Government to re-open and continue the environmental assessments to allow full and proper consideration of all reasonable alternatives and their environmental impacts. Without addressing these issues, WWF does not believe the new planning system can deliver the necessary transition towards a sustainable low carbon economy or deliver the necessary renewable energy developments to tackle climate change and protect our environment.

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