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Draft First Revision to the National Planning Framework

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## Observations:

### 9. Climate Transition and Our Environment

**Chapter:** 9. Climate Transition and Our  
Environment

There is a lack of decision making on major issues in this NPF Review. Hopefully this information will be forthcoming in future drafts. One example is where all the onshore wind generation will go. The National Government must make these substantive decisions at the national level rather than pushing this responsibility down the planning hierarchy to the poorly resourced regional assemblies and local authorities. The Department of Housing and Local Government must work with Local Government to identify areas with potential for wind energy and planning for their development. If this does not happen, we will almost certainly fail to hit all of our targets for decades to come. This should be a spatial plan for the nation that makes the decisions on these important issues. There are references to supporting renewable energy generation such as in NPO's 71 and 72, but this does not go nearly far enough to providing the clarity and certainty needed for the development of onshore wind energy, which is fundamentally a spatial planning issue.

The NPF must make major decisions on a myriad of issues. Onshore wind energy is merely one example that is severely lacking in detail in this document. The NPF should map the areas for potential, then decide on which areas are best suited for developing the renewables that we need to meet our national targets, and then work out how to get them developed with Local Authorities, including them in every step of the process. Unfortunately, a decision has not been made on where the onshore wind energy will go. This, and many other issues, can not be left to already under resourced Regional Assemblies and Local Authorities to figure out on their own. Do they have the backing, guidance and resourcing to make these decisions? These issues need to be figured out and stated at the very top of our government and the very top of our planning hierarchy to ensure they are delivered, and our national climate targets are met.

Hopefully future revisions to the NPF will include this much needed information with decisions being made on the problem of locating onshore wind to meet our national targets, along with the many other issues that this draft first revision to the NPF appears to have side stepped.

Another issue that is very perplexing is that many of the case studies used throughout the document do not add clarity. The department must understand that this document will inform every County Development Plan and planning application submitted across the country. If case studies are to be used, they should be informing the planning system on pertinent issues. Under chapter 3, effective regional development, it is unclear as to why the

Old Rail Trail Greenway is inserted at all. This does not appear to be relevant to the information on the pages before or after this particular case study. There are seven bullet points on the previous page, only one is relevant to greenways. The case study takes up an entire page but fails to provide any real insights into the project such as how the success of the project was achieved or how similar projects could learn from this case study.

Likewise with the Circular Economy case study in chapter 9. The text reads "The Programme delivers activities to implement, regulate and measure the circular economy." This is a missed opportunity to provide guidance to the primary readers of the NPF, who will be frequently opening and reading through the document, as to how to use this case study programme. Case studies would be far better off showing useful information on how the referenced programme could be used by public bodies such as local authorities when creating new County Development Plans or other important documents such as Climate Action Plans, and when delivering projects at a local level. In the page prior to this particular case study, there are several paragraphs describing the circular economy. "This circular economy approach is also applicable to land use management. This Framework sets out recycling rates for the reuse of brownfield land by requiring 40% of new housing to be built within infill and brownfield lands and encourages reuse of existing building stock." A definition for brownfield lands would be welcome in this section. A case study on this matter to provide more insights would be very useful.

This is unfortunately characteristic of the NPF Review document as it currently stands. There are numerous missed opportunities to make key decisions and to showcase best practice for those further down the planning hierarchy who will be tasked with delivering the policies and objectives contained within the NPF. The NPF homepage currently states "The Draft Revision focuses on the need to update the Framework in order to appropriately reflect changes to government policy that have taken place since its initial publication six years ago, such as climate transition, regional development, demographics, digitalisation and investment and prioritisation." For the NPF Review to be successful, tricky issues need to be teased out and decided on at the national level and clear guidance on navigating the issues passed down. As things currently stand, it is up to the Regional Assemblies and for Local Government to make the tricky decisions and to navigate them with little guidance from National Government. The NPF Review is severely lacking in decisions and clarity on massive issues facing the country. This failure to make decisions at the tip of the planning hierarchy will ricochet down the hierarchy if not addressed.

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**Documents Attached:** No

**Boundaries Captured on** No

**Map:**