Local Plan
Covering the former Suffolk Coastal area

Council Response to Matter 2
The Suffolk Coastal Spatial Strategy
E - Major Energy Infrastructure

August 2019
www.eastsuffolk.gov.uk/localplanexamination

Source – www.thesuffolkcoast.co.uk
Contents

**Question 2.32** Given the process for the consenting of Nationally Significant Infrastructure Projects (NSIP) and the designated National Policy Statements, would the Policy as worded be effective? Is the distinction between projects which may be determined locally and those nationally, sufficiently clear?.......................................................................................................................... 1

**Question 2.33** Is criterion b) consistent with national policy as set out in paragraphs 55 and 56 of the Framework and the Community Infrastructure Regulations and is it positively prepared? .................................................................................................................................................................................. 2

**Question 2.34** Is criterion i) seeking local positive outcomes justified in the context of NSIP projects where National Policy Statements apply?........................................................................................................................................................................... 3

**Suggested Modifications** .............................................................................................................................................................................................................. 4
Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects

Question 2.32

Given the process for the consenting of Nationally Significant Infrastructure Projects (NSIP) and the designated National Policy Statements, would the Policy as worded be effective? Is the distinction between projects which may be determined locally and those nationally, sufficiently clear?

1. The Council consider that the section on Major Energy Infrastructure is justified and effective and provides a sound basis on which to address issues relating to the energy sector that come forward in the District over the plan period. The Local Plan acknowledges the role of the Council at the forefront of electricity energy generation across the country in respect of onshore and offshore energy. Considering these issues in partnership with a range of stakeholders such as the local community, New Anglia Local Enterprise Partnership and energy providers.

2. The section and policy have been prepared based on public consultation responses which highlighted that the Council’s current Local Plan, made up of the Core Strategy (Document F1), Site Allocations DPD (Document F2) and the Felixstowe Peninsula AAP (Document F3) only include Policy SP13 which focuses on Nuclear Energy and are silent on the topic of other major energy infrastructure such as offshore wind farms or intercontinental electricity connections. The Neighbourhood Plan for Leiston (Document F7) acknowledges the role of the power station in their community but does not provide policy guidance for future opportunities. In light of the lack of current policy guidance and the public consultation responses highlighting proposals for energy generation as an issue for the District, the Council considered it appropriate to prepare Policy SCLP3.4.

3. The Council acknowledge the role and process of Nationally Significant Infrastructure Projects and National Policy Statements and how these are considered outside of the Local Plan and determined by the Secretary of State. However, some of the proposals that are expected to come forward over the plan period are to be determined by the Council as local planning authority (such as electricity interconnectors which are not covered by National Policy Statements).

4. The 2008 Planning Act states:

   In deciding the application the SoS must have regard to—

   (a) any national policy statement which has effect in relation to development of the description to which the application relates (a “relevant national policy statement”),
(aa) the appropriate marine policy documents (if any), determined in accordance with section 59 of the Marine and Coastal Access Act 2009;

(b) any local impact report (within the meaning given by section 60(3)) submitted to the SoS before the deadline specified in a notice under section 60(2),

(c) any matters prescribed in relation to development of the description to which the application relates, and

(d) any other matters which the SoS thinks are both important and relevant to SoS decision.

5. As Local Planning Authority, the Council has the opportunity to prepare a Local Impact Report on Nationally Significant Infrastructure Projects and Policy SCLP3.4 will have a key role in ensuring that the Council address key issues and local considerations as part of this report. Within a Local Impact Report a local authority can also include topics and reference to development plan documents, development briefs or master plans, as well as Supplementary Planning Documents where relevant documents exist. Therefore the Council consider that the policy approach is justified and effective for inclusion within the Local Plan.

6. The Council is also aware that National Policy Statements may also be silent on proposals or may not accord exactly with the development proposed. As a result, the Local Plan policy will be able to provide an indication of the identified issues which may be beneficial at the decision making stages.

7. Policy SCLP3.4 provides a clear distinction between developments that are to be determined through the 2008 Planning Act (and therefore Nationally Significant Infrastructure Projects) and the Town and Country Planning Act. The Council do not consider it appropriate for the Local Plan to include full details of these criteria which would make a development a Nationally Significant Infrastructure Project. The Council is also aware that there is potential for a project to apply to be a Nationally Significant Project and this may or may not be accepted.

Question 2.33

Is criterion b) consistent with national policy as set out in paragraphs 55 and 56 of the Framework and the Community Infrastructure Regulations and is it positively prepared?

8. The Council considers that criterion b) is appropriate to include, however to ensure consistency with paragraphs 55 and 56 of the National Planning Policy Framework (Document C1), a modification to the text is proposed. Amending the text will ensure consistency with the National Policy Statements relating to Energy (EN-1) and Nuclear Power Generation (EN-6).
9. The Council proposes that criterion b) is amended to read: “Appropriate packages of local community benefit to be provided by the developer to offset and compensate the burden and disturbance experienced by the local community for hosting major infrastructure projects.”

10. As with all proposals, the Council will only seek planning obligations which are necessary and reasonable and in instances where the impacts of the development which can not be mitigated are compensated for.

11. The policy has been positively prepared and complies with the National Planning Policy Framework and the Community Infrastructure Regulations.

**Question 2.34**

**Is criterion i) seeking local positive outcomes justified in the context of NSIP projects where National Policy Statements apply?**

12. Criterion i) is justified in the context of the Nationally Significant Infrastructure Projects and National Policy Statements in the District. Criterion i) provides an appropriate way for positive outcomes to be provided to the local community which are impacted by development proposals for Major Energy Infrastructure.

13. The Council acknowledge that it may be possible to deliver positive outcomes (in the form of mitigation/compensation), but at times, the overall positive outcome for the local community may not be fully realised. The positive outcomes are generally felt in respect of economic benefits and the environmental benefits of being able to generate low carbon renewable energy.

14. Including criterion i) in the Final Draft Local Plan is justified and provides a sound basis on which the Council can ensure that positive outcomes are seen for the District over the plan period.
## Suggested Modifications

<table>
<thead>
<tr>
<th>Modification No.</th>
<th>Paragraph / Policy</th>
<th>Change</th>
<th>Reason</th>
<th>Related Representation</th>
</tr>
</thead>
<tbody>
<tr>
<td>2E.1</td>
<td>Paragraph 3.56</td>
<td><strong>Additional wording in paragraph 3.56:</strong></td>
<td>To include reference to consideration of designated areas.</td>
<td>Rep ID: 192 (Suffolk County Council AONB Team)</td>
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<tr>
<td></td>
<td></td>
<td>“3.56 Although the provision of nuclear energy is currently prominent, the Suffolk Coast is increasingly coming under pressure to support developments associated with the off shore energy sector and linking this into the national grid, as well as inter-continental connections to enable the exchange of electricity with other countries. Investment in a variety of major energy infrastructure projects needs to be supported by infrastructure and facilities on shore and these sectors are expected to require land to enable activities over the plan period. Where new major energy projects are proposed, potential alternative sites, located outside of designated areas should be considered at an early stage. Where possible companies and developers will be encouraged to work collaboratively and share infrastructure and facilities that serve other requirements to reduce any potential impacts.”</td>
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<tr>
<td>2E.2</td>
<td>Table 3.6</td>
<td><strong>Modification to Table 3.6 through addition of bullet point under Environment section</strong></td>
<td>To recognise major energy projects may have impacts on tranquility</td>
<td>Rep ID: 188 (Suffolk County Council AONB Team)</td>
</tr>
<tr>
<td>Modification No.</td>
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<tr>
<td>2E.3</td>
<td>Policy SCLP3.4 (MIQ2.33)</td>
<td>“Impact on tranquillity”</td>
<td>Amend criterion b) to read: “Appropriate packages of local community benefit to be provide by the developer to offset and compensate the burden and disturbance experienced by the local community for hosting major infrastructure projects.”</td>
<td>To ensure consistency with the NPPF.</td>
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