

Your ref: DC/23/05656/FUL
Our ref: Bentley, land at Grove Farm and
land east of the railway line, Potash Lane. 60291
Date: 13 December 2023
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Bron Curtis,
Growth & Sustainable Planning,
Babergh and Mid Suffolk District Councils,
Endeavour House,
8 Russell Road,
Ipswich,
Suffolk,
IP1 2BX

Dear Bron,

Town and Country Planning Act 1990

Bentley, land at Grove Farm and land east of the railway line, Potash Lane, IP9 2BX – developer contributions

I refer to the proposal: Full Planning Application - Construction of Photovoltaic Solar Array, Ancillary Infrastructure, DNO Substation, Customer Substation, Grid Connection and Landscaping.

Suffolk County Council's Developer Contributions Team would make the following comments on the current application:

Firstly, that the application needs to be considered in the context of a number of relevant paragraphs set out in the National Planning Policy Framework 2023. These include the following:

Paragraph 152 which states that the planning system should support the transition to a low carbon future in a changing climate and that it should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources, and support renewable and low carbon energy and associated infrastructure;

Paragraph 155 which states that to help increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);

Paragraph 38 which states that local planning authorities should approach decisions on proposed development in a positive and creative way and that they should use the full range of planning tools available, and work proactively with applicants to

secure developments that will improve the economic, social and environmental conditions of the area.

Paragraph 55 which states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition; and

Paragraph 57 which states that planning obligations must only be sought where they meet all of the following tests:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development; and

Paragraph 104 which states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- c) opportunities to promote walking, cycling and public transport use are identified and pursued.

Paragraph 120 which states that Planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;

Secondly, as you may be aware, in May 2023, the Cabinet of Suffolk County Council agreed an Energy Infrastructure Policy¹ which recognises the need to deliver the UK's net-zero carbon emissions. The policy also recognises that new electricity generation projects can, and will, have a significant impact on local communities and the environment. It aims to provide a framework within which to minimise the degree of conflict between competing priorities, such as protection of the landscape and to minimise impact on local communities.

I would particularly draw your attention to the section of the Policy which makes clear that the County Council is committed to delivering policies, projects and working practices that will contribute to the Council achieving the ambition of net zero emissions for its own operations by 2030. It makes clear in relation to the need for the policy, the following:

- a) To demonstrably recognise that, given Suffolk's locational and other advantages, low carbon, and renewable energy, which has been promoted nationally³ and internationally as a key strand of economic development, is essential to Suffolk's current and future economic growth.
- b) To demonstrably recognise that Suffolk faces specific climate adaptive challenges, which will need to be effectively and robustly addressed to support the economy, whilst protecting and enhancing the communities and environment of Suffolk.

¹ Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy
<https://www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf>

- c) To give the Council the best opportunity to influence the provision of new energy and water infrastructure, to ensure that the benefits for Suffolk's communities are maximised, whilst minimising the adverse impacts on them.
- d) To seek to maximise the benefits of economic growth, skills, and STEM (Science Technology Engineering and Maths) educational inspiration, from energy generation, transmission, and climate adaptive projects, for the communities of Suffolk, to support the long-term economic growth of the area.
- e) To provide other local authorities, energy and water project promoters, Government, and the public, with a clear understanding of the position of the Council in relation to low carbon energy and climate adaptive infrastructure projects, and the policy and process that will guide the Council's response to specific proposals.
- f) To ensure that such schemes fully and appropriately consider the character, function and sensitivity of the natural and historic environment and landscape of the county.
- g) To manage the impact of low carbon energy projects and water management projects, on the environment and our communities, arising not only from the construction and operation of a project alone, but from the in-combination and cumulative effects of overlapping and consecutive projects.

With the above in mind the County Council expects project promoters not only to mitigate the tangible and more easily defined impacts (which are referred to in the comments from County Council consultees below), but also address intangible but real residual impacts on the community and locality.

In relation to the tangible and defined impacts, you will have received separate comments from the County Council as Lead Local Flood Authority (LLFA) and Highway Authority, and from the Active Travel Officer and Senior Archaeological Officer, that you should also take into account.

In relation to the intangible residual impacts on the community and locality, there are, in addition, the potential community benefits from the development, which is referred to in the recently published British Energy Security Strategy (HM Government, April 2022). This identifies the need to ensure that local communities benefit from development of energy infrastructure in their area. The County Council accordingly encourages the consideration of such community benefit options from project promoters. It also seeks to ensure that project promoters consider legacy opportunities of all elements of their development.

The County Council expects project promoters to consider opportunities for local economic benefit in the widest sense, to achieve more positive outcomes for the local area and thus improving the planning balance. Government has indicated that it considers the question on aligning projects with local economic strategies as a topic "best left to the planning application process", hence this is a valid consideration as part of the planning consent. Accordingly, if permission is granted, the project should be contributing to this aim through economic development and skills initiatives agreed through a Local Economic Delivery Strategy. The Delivery Strategy should set out how the Suffolk's supply-chain will be utilized through the procurement opportunities arising from the development and how, for example, the

apprenticeship levy is to be used to increase skills within Suffolk. The County Council hosts a regional Skills Coordination Function and can provide a single point of coordination with relevant stakeholders; we would be happy to work with the developer on the best approach on this matter.

In summary in light of the comments set out above, and in particular the aims of the County Council's Energy Infrastructure Policy, the County Council would expect the following to be fully considered, both for the individual project and cumulatively with the other solar farm proposals in the vicinity:

- a) To mitigate for intangible residual impacts on the community and local amenity, to seek to establish a community fund and other initiatives to the benefit of the community; and
- b) To provide a comprehensive Local Economic Strategy, ideally developed in conjunction with the County Council.

These should be secured as part of a s.106 agreement or, if agreed by the Local Planning Authority, as a condition of any grant of permission.

In addition, the County Council encourages further discussion about legacy opportunities and options of providing community benefit, over and above mitigations for impacts of the scheme. We would be happy to provide further detail on these considerations if that would assist you.

Yours sincerely,

Laura Harrad MRTPI
Planning Officer (Infrastructure)
Growth, Highways, & Infrastructure Directorate