

Rt Hon Claire Coutinho MP
Secretary of State for Energy Security & Net Zero
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Rt Hon Dr Thérèse Coffey MP Secretary of State DEFRA

Lee Rowley MP Parliamentary Under Secretary of State DLUHC

Dear Secretary of State,

Nationally Significant infrastructure Projects (NSIP) - very large-scale solar farms

It has come to the attention of Suffolk County Council, that further vast solar farms have been given connection offers in Suffolk, by National Grid¹.

Therefore, here in Suffolk, as in so many other parts of the country, the issue of balancing competing needs for land, has come into sharp focus; so, the Council would like to take this opportunity to offer some additional commentary, and suggestions for reform, in respect of NSIP scale solar projects.

The Council welcomes the work being led by Greg Smith MP² with His Majesty's Government, to further empower local planning authorities, through the National Planning Policy Framework, to refuse solar applications which put food security at risk.

This is an excellent first step, however, it is suggested that it is important to ensure this change is reflected in the National Policy Statement EN-3, so that this consideration extends to NSIP scale solar.

Furthermore, as exemplified in the case of the Sunnica proposals, agricultural land quality assessments have been the cause of much dispute. Assessments conducted by the developer yielded vastly different results, to assessments conducted by local amenity groups. In order to retain the trust and confidence of communities, we would ask for a process which can demonstrably deliver impartiality, and suggest that through Planning Performance Agreements, County Councils can commission independent Agricultural Land Classification assessments, to inform both the Examination, and the Secretary of State's final decision.

In addition, although 40-year consents are considered temporary, in that they can be fully reversed; given the scale and duration of these projects, we ask that policy is amended such that the Secretary of State can exercise a 25-year break clause, on the *solar panel element* of these schemes. The Council considers such an approach is necessary and reasonable, to allow consideration of the agricultural and energy needs of that time, and the available energy generation technologies; as these may make the

¹ <https://www.eadt.co.uk/news/23869409.solar-developers-risk-neglecting-suffolk-residents-views/>

² <https://www.gregsmith.co.uk/sites/www.gregsmith.co.uk/files/2022-12/221208%20LETTER%20Minister%20Buchan%20to%20Greg%20Smith%20Agri%20Land%20FINAL.pdf>

extensive land take for solar in this form inappropriate, in some locations, having regard for climate, food, and energy resilience.

Finally, we recognise that farmers need to diversify and adapt their businesses for them to prosper. So, we ask government to pursue, at pace, agri-voltaic trials³, which could if successful, allow solar farms and food production to coexist effectively, with potential additional benefits such as reduced water usage.

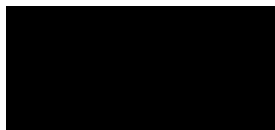
Therefore, Suffolk County Council urges that consideration is given to the further changes to planning process and policy in relation to NSIP scale solar proposals, that would help to balance the needs of the environment, communities, energy security and food production, these are:

- That the final version of the National Policy Statement (NPS) EN3 is updated, to reflect the anticipated changes to footnote 58 of the NPPF, to ensure a similar onus on food security is reflected in the Nationally Significant Infrastructure Project (NSIP) regime.
- That developers must fund, via Planning Performance Agreements (PPAs) with the county councils, independent agricultural land quality assessments, commissioned by a county council, to inform any consenting decision by the Secretary of State.
- That consented NSIP solar schemes have a 25-year 'break clause', at which point the relevant Secretary of State has the power to amend the photovoltaic element of a scheme, in the light of current land need assessments and available technologies.
- That to support genuinely adaptive, multi-functional and flexible land use, the government pursues, at pace, an agri-voltaic trial to establish if this technology will enable farmers to diversify, while keeping land in food production.

The County Council continues to work closely with your officials, and those of the Department of Levelling up Housing and Communities, to improve the operation and effectiveness of the NSIP regime.

Given the extent and magnitude of the infrastructure required, to deliver the government's Net Zero target, and adapt to a changing climate, and the speed at which this must be executed; the processes of development consent, should foster community consent, rather than undermine it; whilst at the same time taking the balanced approach, as put forward by the Prime Minister in recent weeks. I have put forward these suggestions in that spirit.

Yours Sincerely



Richard Rout

Deputy Leader of Suffolk County
Council and Cabinet Member for
Finance & Environment

³ <https://bidstats.uk/tenders/2023/W39/807600468>