

Suffolk County Council's Energy Infrastructure Policy

Scope and purpose of the policy

Suffolk has specific natural and geographic advantages which make it very attractive for locating offshore wind and interconnection projects. Suffolk has established industries, nuclear, offshore gas logistics and agri-tech, as well as climatic conditions, which make it attractive for specific low carbon technologies, especially new nuclear, solar power, hydrogen production and anaerobic digestion.

The delivery of Net Zero¹ in the UK by 2050 is expected to require a pipeline of generation and connection projects in Suffolk. Therefore, significant changes for the economy, environment and communities of Suffolk can be expected as a result.

The purpose of this policy is to outline how, in principle, the Council will engage and influence other parties to ensure adverse impacts to our communities are understood and addressed by future decisions.

The Role of Suffolk County Council

The County Council tends not to be the decision maker. It is not the decision maker for Nationally Significant Infrastructure Projects (NSIP), or other energy projects consented under the Electricity Act 1989. Unless connected to minerals or waste use, or the County Council's own development, energy projects would be determined by district or borough councils under the Town Country Planning Act 1990. The County Council is, however, a key statutory consultee, and its view carries significant weight with the Examining Authority, (ExA) and by extension, the Secretary of State (SoS). Particularly because it has responsibility for a wide range of interlocking issues across the whole county, which affect decision making, having a key role in representing, developing, and supporting, its local communities and protecting their environment.

The County Council is also a significant landowner and 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 2030.²

The need for the Policy

- 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 a post pandemic economic recovery, has the potential to be a key plank of Suffolk's post Covid-19 economic recovery.
- b) To give the Council the best opportunity to influence the provision of new energy infrastructure to ensure that the benefits for Suffolk's communities are maximized whilst minimising the adverse impacts on them.

¹ The Climate Change Act 2008 (2050 Target Amendment) Order 2019

<http://www.legislation.gov.uk/ukxi/2019/1056/contents/made>

² Climate Emergency PDP Cabinet Report Agenda Item 8 14th July 2020

³PM: A New Deal for Britain <https://www.gov.uk/government/news/pm-a-new-deal-for-britain>

- c) To seek to maximise the benefits of economic growth, skills, and STEM (Science Technology Engineering and Maths) educational inspiration, from energy generation and connection projects, are fully realised for the communities of Suffolk, to support the post Covid-19 economic recovery and long-term economic growth of the area.
- d) To provide other local authorities, energy developers, Government, and the public with a clear understanding of the position of the Council in relation to low carbon energy projects, and the policy and process that will guide the Council's response to specific proposals.
- e) 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.
- f) To manage the impact of low carbon 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.

Relationships to the Council's strategic priorities

The Council is collaborating with partners, including the New Anglia Local Economic Partnership and Public Sector Leaders across Suffolk, to work towards making the County of Suffolk carbon neutral by 2030 as set out in the declared **Climate Emergency**⁴

The expansion of renewable/ low carbon energy offers significant opportunities to drive the Council's priority to support **Inclusive Growth**, which it recognises as a key priority⁵ to unlock potential and improve people's quality of life. The active delivery of net zero by the Council will support opportunities for employment and training providing more highly skilled jobs with increased wage and productivity levels for our communities whilst safeguarding Suffolk's natural and historic environment by contributing to **climate change adaptation**. This will help maximise the benefits our environment provides to our economic growth, health and wellbeing for now and future generations.

The Council recognises the requirement to develop the **skills needed for future growth** as a signatory to the New Anglia Local Economic Partnership Youth Pledge⁶. We will support employers to train people in the skills their sectors need, continue our ambitious Apprenticeships Suffolk programme, and work with employers to create more start-up businesses.

However, whilst delivering these policy priorities, the Council will, as set out in **Suffolk's Nature Strategy**⁷ and in **Our priorities 2017- 21**⁵ *"Continue to champion the protection and enhancement of Suffolk's natural and historic environment and our adaptation to climate change, to ensure we maximise the benefits our*

⁴ Council proposes unprecedented environmental plans in response to climate emergency <https://www.suffolk.gov.uk/council-and-democracy/council-news/show/council-proposes-unprecedented-environmental-plans-in-response-to-climate-emergency>

⁵Suffolk County Council Priorities 2017-21 <https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Suffolk-County-Council-Priorities.pdf>

⁶New Anglia youth pledge <https://newanglia.co.uk/youth-pledge/>

⁷ Suffolk's Nature Strategy <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf>

environment will deliver, to our economic growth and health and wellbeing for now and future generations.”

The Role of project promoters

The promoters of energy projects should be responsible corporate entities interested in achieving positive outcomes. National Grid, for example, has published a Responsible Business Charter⁸ that includes designing assets to avoid waste. There is likely to be a high degree of alignment between corporate objectives and the achievement of benefits beyond those that are needed to mitigate the impact of the project. Just as there is an expectation that Suffolk County Council justifies why infrastructure improvements, environmental or other conditions are necessary to mitigate impact, promoters should demonstrate from the outset how they are addressing benefits that align with community needs as well as their own corporate priorities.

Promoters should be seeking to deliver inclusive growth through working with partners, such as Suffolk County Council, to identify and deliver additional social value. National toolkits, frameworks, and individual case studies, such as those available through the Social Value Portal⁹, could assist with this process and the measurement of outcomes. A skills programme, for example, could be achieving a reduction in long-distance commuting, supporting other businesses as well as reducing health inequalities.

If a promoter does not have a clear set of corporate responsibilities, then the willingness to deliver social and environmental objectives, including those necessary to mitigate impact will be a critical matter to resolve. The willingness of the promoter to work with authorities, not just on the mitigation of the direct impacts, but also the integration of their projects into the community, should be an element that promoters look to address during the early stages of consultation.

Promoters should therefore approach communities with a clear rationale of delivering on a range of objectives as part of their project. There might not be perfect alignment between the priorities the promoters outline and those of Suffolk County Council or even the communities. However, by exploring the full extent of potential partnerships at an early stage, promoters will significantly reduce the risk of managing potentially competing demands and any resultant obligations will be full and active commitments, clearly supported by both the promoter and the other parties.

⁸ National Grid Responsible Business Charter 2020
<https://www.nationalgrid.com/document/134426/download>

⁹ Social value Portal <https://socialvalueportal.com/>

The Policy

Priority setting

The County Council will identify its initial strategic priorities in relation to individual energy infrastructure projects coming forward, to help inform the development of those projects, and give clarity to developers, communities, and other parties. Those priorities will be kept under review as proposals are clarified and refined, or new information becomes available.

The County Council will review the effectiveness of its engagement in a project, against these priorities. And it will evaluate the balance of harm and benefit, against these priorities, as the project progresses through the consenting process.

Suffolk County Council has declared a Climate Emergency and is therefore predisposed to supporting projects that are necessary to deliver Net-Zero Carbon for the UK. However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for.

Energy skills and growth

The Council will continue working actively with the energy sector - (developers, owners or operators and associated supply chains), Government, Local Enterprise Partnerships, and regulators, to facilitate the delivery of the policy, that seeks to ensure the use of best available techniques, to maximise the development of energy skills, employment, and educational inspiration in Suffolk. The objective being to create a relevantly skilled talent pool that can take advantage of the opportunities presented by a succession of energy generation and connection projects.

The Council expects that individual promoters will contribute to the delivery of these goals in Suffolk and look to align the achievement of local priorities with their own, going beyond the minimum measures necessary to mitigate the clearly defined impacts of their project. This process should result in measurable outcomes that, for example, deliver social value.

The Council will continue to review and, where necessary, improve local structures and governance to support the development of energy skills, business growth, employment, and educational inspiration, to ensure that the necessary and appropriate business support, skills, and workforce are available so that employment opportunities provided by projects are secured locally.

The Council expect to have comprehensive and effective engagement with developers and their supply chain partners to maximise the local business opportunity, skills inspiration, and employment benefits. Wherever appropriate, the Council and developers should promote synergies between projects that enhance these benefits, deliver growth, and attract inward investment.

Local decarbonisation and climate change adaptation

The Council will expect projects to deliver appropriate community benefit schemes in addition to the necessary compensation and mitigation, including schemes that support the decarbonisation of heat and transport, reduce energy poverty, and improve the climate adaptive resilience of both the natural environment and communities.

Relationship with the environment

Project promoters should recognise from the outset, that the large scale of many energy proposals means that they will conflict with the character and the sensitivities of Suffolk's natural and historic environment, which underpins key economic sectors in Suffolk, and is central to the sense of place of our communities.

The harm to the environment and communities will arise both from the construction and operation of the promoter's project itself and from its in combination and cumulative effects with overlapping and consecutive projects. The Council will expect promoters to develop a demonstrable understanding of the wider development environment for their project, and to work with the Council and other promoters to manage and mitigate these impacts.

The Council will expect project promoters to minimise and mitigate any impacts. Where there is residual harm that cannot be mitigated, this must be appropriately compensated for. If the harm of a proposal is not properly and robustly addressed, the Council will not support the scheme, notwithstanding its national significance or its contribution to decarbonisation.

Developers' engagement with communities

The Council will expect developers and the wider sector to work with community leaders and partners to minimise and manage the impacts of both the individual project's construction and operation, and its cumulative and in combination effects with other concurrent and successive projects. The outcome of this engagement should be to ensure that wider community benefits, as well as the economic and social benefits of energy developments, are realised for the people of Suffolk.

Net Zero infrastructure in Suffolk

The Council recognises that Suffolk will play a very significant role in delivering the UK's Net Zero target. The Council wishes to ensure that Suffolk can fulfil this role, both to support the national and local response to the Climate Emergency, and to maximise opportunities for new and existing businesses and technologies in Suffolk. Whilst recognising the importance of projects to deliver Net Zero, the Council considers it is essential that projects do not lead to avoidable, unmitigated or uncompensated detriment to the communities and environment of Suffolk, and its existing businesses.

The Council recognises that the infrastructure required to deliver the UK Net Zero target will result in significant change in some locations affected. It will work with developers, partners, and communities, to try to secure proposals that avoid, mitigate and, if necessary, compensate for these changes, for Suffolk's people and environment.

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