

PROPOSED MEAFORD ENERGY CENTRE

POLICY OVERVIEW TECHNICAL NOTE

INTRODUCTION

1. Meaford Energy Limited (MEL) is promoting the development of the Meaford Energy Centre and Connections (MEC) which is a new CCGT power station at Meaford Business Park, Staffordshire. The CCGT power station will have an electrical capacity of up to 299 megawatts (MW). The development will comprise the CCGT power station and the integral gas pipeline between the MEC and the existing gas network.
2. The proposal constitutes a Nationally Significant Infrastructure Project (NSIP) under the terms of the Planning Act 2008, as its capacity is greater than 50MW, and therefore, an application for a development consent order (DCO) is to be made to the Planning Inspectorate (PINS), who will examine the DCO application on behalf of the Secretary of State.
3. This technical note is to support preliminary consultation on the MEC proposals. It identifies the principal policy sources to which reference will be made. These include energy policy in the form of National Policy Statements, and planning policy at the national and local level. The section also explains how relevant policy and guidance is being taken into account in MEL's project development programme.

NATIONAL POLICY STATEMENTS

4. National Policy Statements (NPSs) are the primary policy documents used by the Planning Inspectorate when considering applications for nationally significant infrastructure projects (NSIPs). The NPSs for energy were subject to extensive public consultation and scrutiny in Parliament prior to being '*designated*' in July 2011.

Overarching National Policy Statement for Energy (EN-1)

5. This NPS provides an overview of government policy relating to all energy projects, and is supplemented by other policy statements relating to specific technologies.

6. Whilst a significant priority for the Government is to meet targets to cut greenhouse gas emissions by at least 80% by 2050, compared to 1990 levels, EN-1 acknowledges that this cannot be achieved in the short term and that, to ensure security in the UK's electricity supply network, fossil fuel energy generation will remain an important part of the UK's electricity mix, stating that *'some fossil fuels will still be needed during the transition to a low carbon economy'*.

7. According to EN-1 para. 3.6.1:

Fossil fuel power stations play a vital role in providing reliable electricity supplies: they can be operated flexibly in response to changes in supply and demand, and provide diversity in our energy mix. They will continue to play an important role in our energy mix as the UK makes the transition to a low carbon economy, and Government policy is that they must be constructed, and operate, in line with increasingly demanding climate change goals.

8. Para 3.6.2 acknowledges that *'gas will continue to play an important role in the energy sector – providing vital flexibility to support an increasing amount of low carbon generation and to maintain security of supply'*.

9. Other aspects of EN-1 of relevance include an acknowledgement of the need to upgrade the National Grid to accommodate the new pattern of electricity generation (Section 3.7), and favourable consideration for combined heat and power (CHP), in which waste heat is supplied to other users.

10. Part 5 of EN-1 considers the *'generic impacts'* of major energy projects and how these should be considered in new development projects. These include the following, each of which will be assessed by MEL:

- biodiversity and geological conservation;
- civil and military aviation and defence interests;
- coastal change;
- flood risk;
- historic environment;
- land use including open space, green infrastructure and green belt;
- socio-economic;
- traffic and transport;
- waste management.

National Policy Statement for Fossil Fuel Electricity Generation Infrastructure (EN-2)

11. EN-2 adds further detail to the policy requirements of EN-1 with specific regard to fossil fuel energy generation technology such as CCGT power stations. Within this policy statement the policy to be used in considering the environmental effects of fossil fuel power stations is set out.
12. These criteria are additional to the generic impacts set out in NPS EN-1, and relate to the following specific effects:
 - air emissions;
 - landscape and visual;
 - noise and vibration;
 - water quality and resources.
13. MEL will assess the effects of the proposed MEC on these environmental sensitivities.

NATIONAL PLANNING POLICY FRAMEWORK

14. In March 2012 the Department for Communities and Local Government (DCLG) replaced most existing Planning Policy Statements and Minerals Planning Guidance with a single integrated National Planning Policy Framework (NPPF). The NPPF is the principal expression of planning policy for England and is a material consideration in planning decisions. The guidance includes a range of provisions of relevance to the proposed CCGT power station, including those concerning energy production, economic development, and the environmental effects of development. The NPPF opens with the following statement:

*‘The purpose of planning is to help achieve sustainable development. Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations. Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world. We must house a rising population, which is living longer and wants to make new choices. We must respond to the changes that new technologies offer us. Our lives, and the places in which we live them, can be better, but they will certainly be worse if things stagnate.’
(page (i), Ministerial foreword)*

15. NPPF paragraph 7 identifies three dimensions to sustainable development, from which arises a need for the planning system to perform the following roles.
 - **‘an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and

innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
 - **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.'
16. MEL considers that its proposals to bring forward MEC at Meaford Business Park are consistent with each of these dimensions.
 17. First and with respect to economic factors, it is clear that the proposals will be of considerable value to the local and regional economy, both in the shorter term during the construction process, but importantly over the longer term with the creation of new permanent jobs. MEC will be a catalyst for further job creation on Meaford Business Park by the provision of infrastructure to progress the development of Meaford Business Park and encourage inward investment. Additionally there would be considerable revenue to the Treasury during the operational lifetime of the CCGT power station. In the context of Meaford, Staffordshire, and the wider region this represents an exceptionally large investment.
 18. Second, with respect to social considerations, security of energy supply is a fundamental consideration which underpins the proper functioning of society. In simple terms, the UK is in an increasingly vulnerable position such that there is a pressing requirement to maximise the domestic production of energy. Likewise at the local level, the creation of new skilled jobs would help to sustain strong, vibrant and healthy communities in the local area.
 19. Third, with respect to environmental considerations, it is considered that the development can proceed without giving rise to any significant adverse environmental effects that cannot be appropriately controlled through design and mitigation.
 20. Paragraphs 11-16 of the NPPF explain that there should be a presumption in favour of sustainable development, and paragraph 17 sets out the '*core planning principles*' that underpin this. These include proactively driving and supporting sustainable economic development, seeking to secure high quality design, protecting greenbelts and the intrinsic character and beauty of the countryside, and encouraging '*the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value*'.

21. Under the heading *Delivering sustainable development*, paragraphs. 18-22 of the NPPF then proceeds to explain how planning can help to build a strong, competitive economy, through measures including the identification of *'priority areas for economic regeneration, infrastructure provision and environmental enhancement'*.

22. According to paragraph 19:

"The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system."

23. Paragraph 80 of the NPPF states that the Green Belt *'serves five purposes:*

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

24. The location of the application site, the nature of the proposed development, and the fact that it is a previously developed site mean that there is no conflict with the first four purposes identified above. The fifth is of some relevance to MEL's proposal in terms of recycling derelict land. Paragraph 111 of the NPPF similarly highlights the benefit of focussing development on brownfield sites as a means of conserving and enhancing the natural environment.

25. Overall, MEL's proposals are consistent with relevant provisions of the NPPF both strategically and in terms of the thematic guidance offered by the Framework, subject to the maintenance of adequate safeguards to protect the natural environment. On this basis, it is concluded that the application should be given positive consideration. Whereas the decision-maker in this case is not the Local Planning Authority, paragraphs 186-187 of the NPPF are nonetheless of indirect relevance in this regard:

'186. Local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development. The relationship between decision-taking and plan-making should be seamless, translating plans into high quality development on the ground.

187. Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.'

LOCAL PLANNING POLICY

26. In light of the abolition of Regional Strategies, including all remaining county-level Structure Plan policies, the Development Plan now consists only of policies 'saved' from the *Stafford Borough Local Plan 2001*. Key provisions from this plan are outlined below, followed by an overview of the emerging *Plan for Stafford Borough*, which was submitted to the Secretary of State for examination on 20 August 2013.

Staffordshire Borough Local Plan 2001

27. The Stafford Borough Local Plan was adopted in October 1998, with the review conducted in 2001. A number of its policies have been 'saved' and will therefore remain in force until replaced by the emerging Stafford Borough New Local Plan.
28. Policies E&D1 and E&D2 set out general requirements for all development in Stafford Borough in terms of design and landscaping. These policies require development to be of a high quality, and provide for an 'interesting and attractive environment', and for development to integrate with the character and quality of the environment they are located in. Given the open rural character of the surrounding area and its Green Belt designation careful consideration is required both in design and landscape terms to ensure that development integrates with the surroundings. The legacy of a mature landscaped setting provided by the former power stations will help to integrate new development.
29. The Local Plan defines two major development sites within the north Staffordshire Green Belt that are considered suitable for re-development. The application site at Meaford is designated under *Policy E&D13 Redevelopment of Major Developed Sites in the Green Belt*, as a major developed site. This policy states that complete or partial re-development of the identified major development sites in the Green Belt *'will be acceptable provided that the new development:*
- '(a) has no greater impact than the existing development on the openness of the Green Belt and the purposes of including land in it, and where possible have less;*
 - (b) contributes to the achievement of the objectives for the use of land in Green Belts;*
 - (c) does not exceed the height of the existing buildings; and*
 - (d) does not occupy a larger area of the site than the existing buildings (unless this would achieve a reduction in height which would benefit visual amenity).'*
30. Since all buildings on the site have been demolished criterion (c) is not relevant, although planning permission exists for 1.2 million sq ft of new employment use, a major commercial development on the site. One of the primary purposes of policy E&D13 and PPG2 with regard to large brownfield sites is to either ensure that they are remediated to a pre-development condition, or to ensure their comprehensive redevelopment with associated landscape improvements to minimise their impact on the Green Belt.

31. MEL believe that development of a CCGT power station on this site would achieve the latter.
32. The Trent and Mersey Canal Conservation Area is located immediately to the east and south of the site, and thus *Policy E&D18 - Development likely to affect Conservation Areas* is relevant. This policy aims to preserve or enhance the character and appearance of Conservation Areas within the Borough.
33. Given the proximity of the site to this designation, sensitive landscaping and screening are required to mitigate any impacts.
34. In addition to the aforementioned policies, there are several relating to nature conservation (E&D36 through to E&D40 in particular). MEL considers that the proposed development will be able to demonstrate compliance with these policies, through the process of Environmental Impact Assessment (EIA) which will identify any potential effects on nature conservation interests, and mitigation and control measures necessary to prevent adverse effects.

The Plan for Stafford Borough (pre-submission publication draft, 2013)

35. The proposed Plan for Stafford Borough will replace the existing Borough Local Plan and deal with a range of issues including how the *presumption in favour of sustainable development* will be approached locally, and the scale and distribution of housing and employment development.
36. With regards to the proposed CCGT power station at Meaford Business Park the overall policy framework in the emerging plan is similar to those in the existing Local Plan. Draft policy *E5* for example identifies the former Meaford Power Station site as a *Major Developed Sites in the Green Belt* where '*limited infilling or the partial or complete redevelopment will be supported for employment purposes consistent with Spatial Principle SP7, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development*'. Spatial Principle 7 itself states that where sites are located in the Green Belt, development will only be supported where it is '*consistent with national policies for the control of development*'.
37. MEL's proposals at Meaford Business Park are consistent with national policies for the control of development in the Green Belt because both the site and the proposed use are exceptional and would not undermine the purposes for which the Green Belt was established, as identified above in relation to the NPPF. New electricity-generating infrastructure is essential to provide security of energy supply, and for a range of environmental, technical, and commercial reasons a former power station site represents an ideal location to develop a new one. The proposals would not give rise to 'sprawl', merge existing settlements, or (being a brownfield site) extend into true countryside.
38. Other policies in the emerging Plan to which MEL's proposals will have particularly close regard include:
 - *Policy N4 – The Natural Environment and Green Infrastructure* which seeks to protect, enhance and improve the environment of the Stafford Borough through careful management of the development process;

- *Policy N8 – Landscape character*, which requires proposals to be ‘informed by’ and ‘sympathetic to’ landscape character;
 - Policy N9 – Historic Environment, which requires development proposals (inter alia) to ‘conserve and protect the significance of heritage assets’.
39. In principle MEL’s proposals at Meaford Business Park are capable of fulfilling these policies subject to the detailed design and environmental impact assessment which will inform any necessary mitigation and enhancement measures.

CONCLUSION

40. From this overview of relevant energy and planning policy it is considered that the proposals by MEL have the potential to meet a range of strategic policy objectives, including:
- enhanced security of energy supply, nationally and locally, and through the potential to supply surplus heat;
 - the appropriate use of gas resources in the transition to a low carbon economy;
 - economic regeneration in the region;
 - the effective use of brownfield land;
 - provide the catalyst for developing the remaining Meaford Business Park to create jobs and encourage inward investment.
41. At the same time, the policy review has highlighted the need for development to respond to local environmental sensitivities, including landscape, ecology, heritage, air and water quality and the protection of residential amenity, through careful siting and high quality design. These requirements are reflected in MEL’s project approach, and will be informed and verified by a phased process of stakeholder consultation.