

From: [B Fogarty](#)
To: [Medworth](#)
Subject: Re Copy of Comments by B Fogarty in the Open Floor Hearing 3
Date: 25 July 2023 11:10:48

Dear Case Team

Looking in the Examination Library I was surprised to find my comments from the Open Floor Hearing 3 were not present, only to check my email and find the completed comments had sat in my Draft folder since deadline submission day, the 10th July!

Appreciate the deadline is three weeks past and that the Examiners third questions have now been published but include the email below for completeness and just in case any of the comments are significant and not covered elsewhere,

Regards

B Fogarty

Dear Examiners

As requested, my comments in the Open Floor Hearing 3 held on 29th June.

My concern about this proposal is that there are already a high number of energy infrastructures in the Wisbech area and that the addition of another is incompatible with the planning principle of necessary but unattractive developments being sited as equally as possible among those who benefit from them.

This was raised as relevant representation RR-250 and written representation REP2-045. The Applicant has commented on these and those comments have raised four points.

‘Comment Noted’

The first point is regarding the planning principle of equitable distribution of necessary but unattractive sites among those benefitting from the development. The Applicant’s comment on RR-250 was: ‘Comment noted’. Could the Applicant clarify whether ‘Comment noted’ implies an acceptance of that principle or is it neutral, that is, neither accepting or dismissing the principle?

Cambridgeshire and Peterborough Minerals and Waste Local Plan

On selecting the site at Wisbech, the Applicant commented one reason is it ‘... was allocated for waste treatment facilities in the previous Cambridgeshire and Peterborough Minerals and Waste Local Plan...’.

Mention of this plan highlights a relevant feature of the site which is that Wisbech is a border town. It’s situated in Cambridgeshire but parts of the town are in Norfolk and other parts within four miles of Lincolnshire. The justification from the Minerals and Waste plan covers those living in Cambridgeshire, should the Applicant not also provide a similar mandate for Norfolk and Lincolnshire?

Concentration of NSIPs

Regarding the concentration of energy infrastructure in the Wisbech area, the Applicant responded: ‘... inspection of the National Infrastructure Planning project list suggests one ‘energy project’ within ten miles of the Proposed Development, which is the Palm Paper Mill, Kings Lynn...’.

I attended the Applicant’s presentation in Walton Highway. Within a ten mile radius of that village hall are the following ‘energy projects’ :

The electricity substation at Walpole
The power station at Sutton Bridge.
The power station at Kings Lynn
The Palm Paper Mill

Additionally, planning permission has been granted for a second power station (power station B) adjacent to the existing Kings Lynn Power Station. That only one of the above appears on the NSIP Project List is due to a number of factors, for example, some were built before the NSIP legislation. Does the Applicant think this is not a high concentration of 'energy projects' within the area?

Wind Farms Exclusion

Also regarding the concentration of energy infrastructure within the area, the Applicant responded that they '... do not believe that the number of energy infrastructure projects, excluding off-shore wind farms is unrepresentative of other regions within England'. Given offshore windfarms are a necessary but unattractive development that provide energy, what is the basis for the Applicant excluding them from the concentration of energy projects in the region?

The above four points give the impression the proposal may be based on the assumption the NSIP process sets a number of requirements which if met allow standard planning considerations to be bypassed. An impression supported by assertions made during the OFH, notably the Applicant has failed to carry out a mandatory water test and failed to consider alternative sites in the locality, claims which may or may not be true. However, plainly planning principles cannot be ignored as suggested in an aim of the original legislation to 'place communities at the heart of the process', something repeated in the reforms currently proposed to Parliament and in the Planning Inspectorate's answer to FAQ57 on National Infrastructure Planning, where the recommendation to the Secretary of State for a proposal has to give consideration to where any '...national policy statement has effect',

Regards

B Fogarty