

Suffolk Coastal District Council,
Planning Dept,
Melton Hill,
Woodbridge,
Suffolk

IP12 1AU

FAO Mark Edgerley

17th November 2014

By email to suffolkcoastallocalplan@eastsuffolk.gov.uk

Dear Mr Edgerley

**PUBLIC CONSULTATION
COMMUNITY INFRASTRUCTURE LEVY (CIL) – DRAFT CHARGING SCHEDULE**

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, renewables, coal and gas-fired electricity generation, combined heat and power, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including both residential and business users.

EDF Energy welcomes the opportunity to respond to this consultation on the Local Planning Authorities draft charging schedule for CIL.

Our general view on CIL is outlined below:

Our key points are:

- We firmly believe that all energy infrastructure should be exempt from CIL.
- Section 106 (s106) Agreements under the Town and Country Planning Act 1990 (TCPA) and the Planning Act 2008 provide a more appropriate framework for mitigating the identified impacts of a proposed development and for delivering any community development required in response to infrastructure investments.

- Where implemented, CIL should be led by the need for clearly identified infrastructure that would encourage further development within that area.

It is noted and supported that the draft charging schedule provided as part of this consultation exempts new energy infrastructure projects and also exempts extensions and new buildings at existing generating Stations such as Sizewell B.

The CIL guidance on Charge setting and charging schedule procedures published in March 2010 advises charging authorities when identifying infrastructure that is to be funded by CIL that they "will want to consider what additional infrastructure is needed in its area to support development" (page 6, paragraph 12). It would seem to us that energy infrastructure fits that definition, and whilst it is clear that CIL should not be used to fund such infrastructure, it would seem at odds with this principle if developers of energy projects are charged CIL.

Energy infrastructure projects already contribute to meeting the costs of providing mitigation for identified impacts that arise from those projects. This is done through the existing s106 agreements under the TCPA and Planning Act 2008, and in our view this is the more appropriate system for such mitigation provided that all the planning tests are met.

Once again thank you for the opportunity to comment on the consultation.

Please do not hesitate to contact Nick Cofield, Planning & Development Manager, EDF Energy Generation Ltd if you wish to discuss matters further. He can be contacted on nicholas.cofield@edf-energy.com

Yours sincerely

Angela Pearce

Corporate Policy and Regulation Director