

Family Name	Edwards
Given Name	S
Company / Organisation	SP Energy Networks
Person ID	1286784
Title	Stakeholder Submission
Type	Web
Family Name	Edwards
Given Name	S
Company / Organisation	SP Energy Networks
Person ID	1286784
Title	JPA 33 New Carrington
Type	Web
Soundness - Positively prepared?	Sound
Soundness - Justified?	Sound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Sound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The proposals allocate land covered by strategically important electricity networks.</p> <p>The avoidance of any adverse impact on this network is critical as we drive to maintain a network that is capable of meeting the increase in demand from an all-electric economy. SP Energy Networks has started a process of developing investment targets from 2023 to 2028 to meet the UK and devolved Governments ambitious decarbonisation targets for Net Zero. The next decade will be crucial in preparing the grid for these changes and this is why we are very interested in being able to comment on the proposals which may undermine maintaining and developing a suitable future grid network.</p> <p>SP Energy Networks also holds a number of legal rights to provide unfettered long term access to these assets which need to be protected in the area where development is proposed.</p> <p>It is noted that Section 14 of the New Carrington Topic Paper acknowledges the existing overhead electricity lines and that these will need to be considered further as part of the more detailed masterplanning stage. It is also noted that Figure 6 helpfully shows these overhead lines. This is especially so given the Topic paper also refers to ensuring the proposed allocation delivers development which aligns with net zero objectives.</p> <p>SP Energy Networks supports the Green Infrastructure Plan in Figure although considers there should be more green corridors shown within the development area which protect existing infrastructure and enhance the area. In many areas, there are already green edges to the existing developed areas so these should be retained. The masterplan in Figure 13 shows these</p>

	<p>area so for consistency these should be carried through to the green networks plan.</p> <p>However, this is lost entirely on the proposals map in the main PfE document where Figure 11.48 just refers to housing and employment uses and no open space at all.</p> <p>The applicant should be advised to discuss the above with SP Energy Networks as soon as possible.</p> <p>I would appreciate you confirming the above comments can be taken into account.</p>
<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>Amend the policy map in Fig 11.48 to reflect what's set out in the New Carrington Topic Paper.</p> <p>Amend Policy JP Allocation 33 para 48 to include reference to ensuring existing infrastructure services are protected and utilised in providing upgraded networks to deliver the modernised services listed in para 48.</p> <p>Insert in para 11.339 a reference to the need to utilise as much as possible existing green corridors</p> <p>Insert a new para 11.352 to refer to the need to accommodate existing network services which are critical to delivering future proposals.</p> <p>Other comments relating to the above may be added following further review of the proposals and discussions with the relevant bodies.</p>