



## Non-technical Summary: Planning Policy

### Introduction

This briefing note includes a summary of the ways we have considered local and national planning policy in our planning application for the proposed White Cross Offshore Windfarm project. (It does not include any new or additional assessment against policy.)

### Local Planning Policy

When we submitted our planning application in August 2023, the Braunton Neighbourhood Plan had not yet been formally incorporated into North Devon Council's development plan. We therefore assessed our application against the draft plan which was then at an advanced stage and was submitted to Braunton Parish Council just a few weeks later. You can find out more about how we did this by looking at Section 4.4 of our Planning Statement and [Chapter 3 of our Environmental Statement](#). We have also made sure our plan complies with the North Devon and Torridge Local Plan – for more information, see [Section 5 of our Planning Statement](#) and [Chapter 3 of our Environmental Statement](#).

### National Planning Policy

#### National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the government's planning policy for England and how it should be applied, with the primary intention of ensuring development is consistent with government economic, environmental and social policies.

All applications for development, including applications submitted to a local planning authority under the Town and Country Planning Act 1990 (TCPA1990) such as ours, should be determined in accordance with the NPPF.

All policies within local plans, such as the Braunton Neighbourhood Plan and the North Devon and Torridge Local Plan are required to be consistent with the NPPF.

#### National Policy Statements

The National Policy Statements (NPSs) provide planning guidance, which commonly relate to nationally significant infrastructure (such as power plants, roads, rail etc). Nationally Significant Infrastructure Projects (NSIPs) uses a separate process for planning consent, under the Planning Act 2008 (PA2008).

There are 12 NPS covering energy, transport, water and waste water and waste.

Whilst this project is not an NSIP, it is helpful and potentially best practice to consider the relevant NPS relating to energy. This is because it is relevant and can assist the planning decision making process, but does not mean the project becomes an NSIP.

It will still be decided under the Town and Country Planning Act 1990 by the local planning authority.

### **Rochdale Envelope**

Many projects do not finalise the exact details of their design until after consent has been granted which allows the local planning authority, and other statutory bodies such as the Environment Agency, greater influence over the final design. As a result, a concept called the 'Rochdale Envelope' has been developed to allow some flexibility in the approach.

As part of our application, we need to supply an Environmental Impact Assessment (EIA). This is a suite of information that provides the baseline environmental data for the development, for many different aspects, such as ecology, noise, air quality etc. It then uses independent modelling and assessment from specialists to predict the impacts of the development on the environment.

By using the Rochdale Envelope for the White Cross application, we can ensure the EIA is based on the widest parameters and allows for all potential design scenarios, including calculating the worst case scenario. This enables greater transparency and allows for a greater margin of safety.

It is common practice for the Rochdale Envelope to be used when designing electrical infrastructure that can accommodate future operational flexibility.

To allow for an 'in principle' assessment of the proposed substation, we submitted a Design Code which sets out the maximum parameters for its operation. These parameters cannot be exceeded or deviated from in the final detailed design.

You can find out more about our use of the Rochdale Envelope in [Section 5 of the Planning Statement](#) and Section 1.3 of the Design and Access Statement. Its use was agreed with North Devon Council during the pre-application stage.

### **Town and Country Planning Act**

We have complied fully with the Town and Country Planning Act (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations).

As set out in the EIA Regulations, our Environmental Statement (ES) provides a full, factual description of the development with an emphasis on the likely "main" or "significant" environmental effects of the development. In further compliance with the Act, a non-technical summary of the statement has also been submitted. Copies of the ES were also provided for the local authority to display at their preferred location (North Devon Council office in Barnstaple).

Permission for the offshore part of our project is determined by the Marine Management Organisation (MMO). However, we have included offshore information in our onshore ES to allow Natural England, the statutory consultee for the terrestrial environmental, the opportunity to comprehensively assess the environmental impact of the project on the intertidal area. The intertidal area falls under the jurisdiction of both Natural England and the MMO so onshore information has also been provided to the MMO as part of the offshore ES.