

Planning Policy & Built Heritage Working Party



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Friday, 9 April 2021

A meeting of the **Planning Policy & Built Heritage Working Party** of North Norfolk District Council will be held remotely via Zoom on **Monday, 19 April 2021 at 10.00 am.**

At the discretion of the Chairman, a short break will be taken after the meeting has been running for approximately one and a half hours

Members of the public who wish to ask a question or speak on an agenda item are requested to notify Democratic Services no later than 5pm on the Thursday before the meeting and provide a copy of the question or statement. An email invitation will be sent to you. Statements should not exceed three minutes. Email: democraticservices@north-norfolk.gov.uk

The meeting will be broadcast live to YouTube and will be capable of repeated viewing. The entirety of the meeting will be filmed except for confidential or exempt items. If you attend the meeting and make a representation you will be deemed to have consented to being filmed and that the images and sound recordings could be used for webcasting/training purposes.

Emma Denny
Democratic Services Manager

To: Mr A Brown, Mrs P Grove-Jones, Mr N Dixon, Mr P Fisher, Ms V Gay, Mr P Heinrich, Mr R Kershaw, Mr G Mancini-Boyle, Mr N Pearce, Mr J Punchard, Dr C Stockton and Mr J Toye

Substitutes: Mrs A Fitch-Tillett, Mrs W Fredericks and Mr A Varley

All other Members of the Council for information.
Members of the Management Team, appropriate Officers, Press and Public



If you have any special requirements in order to attend this meeting, please let us know in advance

If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

A G E N D A

1. APOLOGIES FOR ABSENCE

2. PUBLIC QUESTIONS

3. MINUTES

(Pages 1 - 6)

To approve as a correct record the Minutes of a meeting of the Working Party held on 22 March 2021.

4. ITEMS OF URGENT BUSINESS

To determine any other items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act 1972.

5. DECLARATIONS OF INTEREST

(Pages 7 - 8)

Members are asked at this stage to declare any interests that they may have in any of the following items on the agenda. The Code of Conduct for Members requires that declarations include the nature of the interest and whether it is a disclosable pecuniary interest. Members are requested to refer to the attached guidance and flowchart.

6. UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)

7. LOCAL PLAN DRAFT POLICY APPROACHES TO SUSTAINABLE DEVELOPMENT

(Pages 9 - 34)

Summary:

This report considers the representations made at Regulation 18 stage of plan preparation and seeks to endorse the policy approach concerning matters of sustainable development.

Recommendations:

It is recommended that Members endorse the revised Policy below, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager:

SD7 – Renewable and Low Carbon Energy

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email:	

Caroline Dodden, Senior Planning Officer, 01263 516310
Caroline.dodden@north-norfolk.gov.uk

Iain Withington, Planning Policy Team Leader, 01263 516034
Iain.Withington@north-norfolk.gov.uk

8. NORTH WALSHAM WESTERN EXTENSION: PUBLIC ENGAGEMENT

(Pages 35 - 38)

Summary: This report provides an outline of the upcoming public engagement approach for the Western Extension.

- Recommendations:**
- 1. To approve the approach to public engagement on the emerging principles in the Western Extension Development Brief, and;**
 - 2. That delegated authority is given to the Planning Policy Manager on the final timing and content of the engagement material following consultation with the Chair of the Planning Policy and Built Heritage Working Group and North Walsham Members.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email: Stuart Harrison, Senior Planning Officer – Planning Policy Team. Stuart.harrison@north-norfolk.gov.uk 01263 516308.	

9. ANY OTHER BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE

10. EXCLUSION OF PRESS AND PUBLIC

To pass the following resolution (if necessary):

“That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A (as amended) to the Act.”

11. TO CONSIDER ANY EXEMPT MATTERS ARISING FROM CONSIDERATION OF THE PUBLIC BUSINESS OF THE AGENDA
12. ANY OTHER URGENT EXEMPT BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE

PLANNING POLICY & BUILT HERITAGE WORKING PARTY

Minutes of the meeting of the Planning Policy & Built Heritage Working Party held on Monday, 22 March 2021 at the remotely via Zoom at 10.00 am

Working Party Mr A Brown (Chairman) Mrs P Grove-Jones (Vice-Chairman)
Members Present: Mr N Dixon Mr P Fisher
 Ms V Gay Mr P Heinrich
 Mr R Kershaw Mr G Mancini-Boyle
 Mr J Punchard Dr C Stockton
 Mr J Toye

Members also attending: Mr H Blathwayt
 Mrs A Fitch-Tillett

Officers in Attendance: Planning Policy Manager, Democratic Services Manager and Democratic Services & Governance Officer (Regulatory)

82 APOLOGIES FOR ABSENCE

An apology for absence was received from Councillor N Pearce. There were no substitute Members in attendance.

83 PUBLIC QUESTIONS

None.

84 MINUTES

The Minutes of a meeting of the Working Party held on 22 February 2021 were approved as a correct record.

85 ITEMS OF URGENT BUSINESS

None.

86 DECLARATIONS OF INTEREST

None.

87 UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)

The Chairman welcomed Councillor R Kershaw to his first meeting following his appointment to the Working Party in place of Councillor T Adams. He expressed his thanks to Councillor Adams for his work during his time as a Working Party Member.

88 PLANNING POLICY - MONITORING REPORT 2019-20

The Planning Policy Manager presented a report that provided an overview of the main development trends in the District in the period 2019-2020 and measured performance against adopted Core Strategy policies and corporate objectives. He presented slides which gave more detail in respect of the key indicators in the Monitoring Report. He stated that the document would be published on the

Council's website within the next few weeks and would send the link to Members once the document had been published.

The Chairman stated that the Annual Monitoring Report was an important baseline document and thanked the Planning Monitoring Officer for his report.

89 NORFOLK STRATEGIC PLANNING FRAMEWORK

The Planning Policy Manager presented a report that provided an update on the progress of the Norfolk Strategic Planning Framework and Statement of Common Ground following a recent review. He explained that this document would provide evidence to the Planning Inspector that the Council had fulfilled its legal duty to co-operate with neighbouring authorities and other relevant bodies on cross-boundary issues at the examination stage of the Local Plan. The document would continue to be amended and reviewed. However, there had been an indication in the Planning White Paper that the duty to co-operate might be removed at some time in the future. He recommended the formal endorsement of the revised document.

Councillor J Punchard considered that strategic employment sites should be developed to serve the north and west of the District, bearing in mind the amount of housing that would be built in Fakenham and the Cromer/Sheringham area. He also considered that there should be more emphasis on improving digital connectivity for all dwellings, whether new build or existing, as many people suffered from poor connectivity and internet speeds and there was a greater need now more people were working from home.

The Chairman stated that employment promotion and the need to provide employment to support housing developments was raised regularly at the Working Party. The main towns of Fakenham and North Walsham, in addition to the existing Enterprise Park at Scottow, were primary areas to consider for development. The Duty to Co-operate Forum had discussed connectivity issues and the need to improve the 4G connectivity before investing in 5G.

Councillor R Kershaw considered that it was evident from meetings he had attended on behalf of the Leader that there was a concentration on the tech corridor from Cambridge to Norwich, but nothing for the west of the area. There were assets such as West Raynham and Tattersett that should be developed, but these were not covered in any detail in the document. He considered that there should be more engagement for North Norfolk in the tech sector, and particularly in the west of the District.

The Planning Policy Manager advised the Working Party to support this version of the document, but to make the point that the next version should take a broader view of the issues affecting the rural economy and place greater emphasis on the specific issues affecting North Norfolk. With regard to issues raised regarding connectivity, he stated that this document related to land use issues and therefore the retrofitting of existing dwellings and informing decisions in respect of network investment sat outside the Local Plan process. The Local Plan could influence the delivery of specific measures through planning applications for new build developments, but the broader aspects relating to roll out were corporate objectives rather than land use planning issues.

Councillor P Heinrich considered that there was little point considering industrial developments if the telecommunications was inadequate and pressure should be put on the Government and Openreach. He stated that it had been reported that North

Walsham was likely to be connected to gigabit fibre within the next few years but it was also needed in other parts of the District.

Councillor C Stockton supported Councillor Heinrich's comments and stated that there were myriad small businesses around the District which could only operate properly if they had a decent standard of broadband. Businesses could not be developed unless the telecommunications problem was sorted out.

Councillor N Dixon referred to the proposal to develop an enterprise zone at Egmere that had not been progressed. He had previously made the point that there would be a void in the west of the District if it did not come forward as envisaged and there should be additional weight given to the allocation of a site in the west. He also supported Councillor Heinrich's points regarding the need for infrastructure to support employment.

In addition, Councillor Dixon referred to agreements 21, 22 and 23 of the document, in particular with regard to water resources and flooding problems. He considered that there was insufficient capacity for the supply of water to meet the domestic, economic and environmental requirements and the water supply problem had not been sufficiently highlighted in the document. Foul water capacity was also an important issue and there had been a number of incidents recently where foul water had caused problems in various parts of the District. He also considered that the document did not adequately reflect concerns regarding road infrastructure capacity or landscape and wildlife conservation. He considered the finalised version of this document needed to be strengthened and be more accurately reflective of the day to day problems.

The Planning Policy Manager explained that this document would be the principal evidence to demonstrate that local authorities were co-operating in an effective way, and it would be better to go to examination with the most up to date document available. He considered that other partner authorities that were closer to examination than North Norfolk would have concerns if the document were returned for major redrafting. The framework was subject to a continuous process of updating and he suggested that whilst there was nothing substantially wrong with the document as written, there were some deficiencies that could be flagged for further consideration in the next version, which was likely to be published within the next 18 months. He recommended that the Working Party endorse the document subject to the list of issues raised by Members for consideration in the next version.

Councillor Dixon considered that the points relating to flooding, both by foul and surface water, should be reinforced in version 3, as it was a current issue that affected everybody and needed to be dealt with now and not at some point in the future.

Councillor Ms V Gay supported Councillor Dixon and considered that some specific requirements could be strengthened. She welcomed the attention to health issues in the document. However, she noted that whilst there were laudable aspirations in the section relating to Norfolk's rich and biodiverse environment, the wording 'where possible' was used and she was concerned that there was a lack of strong, serious commitment. She considered that the document should be endorsed but could have been stronger.

The Planning Policy Manager explained that the purpose of the document was not to set policies. It was a list of agreements and it was necessary to avoid writing the document in such a way that it prevented individual authorities from writing their own

policies in their Local Plans, hence the use of words such as 'where possible'.

Councillor Mrs P Grove-Jones stated that the Internal Drainage Boards were very important but had only been mentioned once in the document. She stated that the IDBs were trying to persuade landowners to build reservoirs on their land to hold potable fresh water that was currently pumped away to sea during heavy rainfall. Whilst houses should not be built without employment opportunities to support them, she questioned the need for large commercial/industrial sites if the majority of population growth was in the over 60 age groups. North Norfolk thrived on its many small business and the tourist trade.

The Planning Policy Manager stated that the latter point was a difficult one. The Working Party was reluctant to see employment land released for other purposes but there were large allocations that had not been developed. In other parts of the District, such as Hoveton, expanding businesses could not find suitable land to retain their businesses in their current location. There was a need to provide the opportunity for people who wanted to come and invest in the area and needed traditional employment land, but also to promote small business growth which did not require it. Employment allocations were increasingly used for other purposes, eg. care facilities which created significant local employment and included well-paid jobs, whereas some manufacturing or distribution businesses did not generate many jobs. There was a need to consider a range of employment opportunities, rather than concentrate on one particular sector.

Councillor Mrs Grove-Jones considered there would need to be a large increase in the care support system as the Government was moving towards encouraging people to be cared for in their own homes. She considered that this area of economic development had not been fully considered in the report or the Local Plan and there was a need to provide a decent wage base.

The Planning Policy Manager stated that there were many policies in the Local Plan that related to living at home, assisted living and elderly persons accommodation. Land was allocated in the Plan for employment purposes and policies were very permissive regarding all types of employment. It did not frustrate the Council's ability to grow the employment base and create better quality jobs, but this was a wider strategy than the Local Plan, the purpose of which was to set out land use policies to enable growth.

Councillor J Toye referred to the water issue and stated that, without this framework, there was potential that this authority could set strong policies with regard to water use and sign up to Water Resources East, but a neighbouring authority may not. The agreements were a baseline upon which to build and whilst this framework could not set policy, it would ensure that there was a shared responsibility to deal with issues across the wider community.

Councillor R Kershaw stated that whilst he supported the framework document, there was uncertainty as to the future impact on the pandemic on businesses in the area, and there was already a change in approach with smaller businesses coming in that could change the way the economy worked. Climate change would also have an impact. He considered that there would be a much more rapid change in the economy over the next few years, and it was very hard to forecast what would happen given that the situation would be very different in 18 months' time. He considered that there would need to be caveats and changes to the framework document before it moved forward.

Councillor Dixon considered that all authorities would be experiencing similar issues with regard to surface and foul water flooding and he suggested that there could be some scope to give extra emphasis on these issues in this version of the document.

The Planning Policy Manager summed up the Working Party's views that Members were happy to endorse the document, subject to improvements to the flooding/drainage agreements before publication, and a number of matters to be included in version 4, recognising the changes that may arise in 18 months' time as a result of the pandemic.

Councillor Toye pointed out that whilst it had not been covered in any great depth, agreement 8 referred to the New Anglia Covid Recovery Restart Plan.

Councillor Punchard stated that he had attended many flooding incidents with the Fire and Rescue Service and there were always particular areas that suffered. He stated that 1 in 100 year flooding events were becoming more frequent. Whilst it was right to build more housing, they created more surface area that would require drainage.

Councillor Toye considered that there were issues with maintenance of existing drains and although it was outside the scope of this document, it was necessary to find an appropriate way to deal with it.

The Chairman stated that the Strategic Planning Framework was an important document for the Inspector as plans were referred back to local authorities if they had not fulfilled the duty to co-operate requirements. He asked if it was possible to use a similar process to develop a statement of common ground in relation to major developments.

The Planning Policy Manager confirmed that it was the intention to introduce statements of common ground. They were not legally binding, but they were useful to demonstrate to the Inspector that there was a reasonable prospect of development coming forward on allocated sites, and to defend the Local Plan against claims that the strategy was not deliverable.

RECOMMENDED unanimously

- 1. That the *Norfolk Strategic Planning Framework and Statement of Common Ground 2021* and the Agreements contained therein are endorsed by North Norfolk District Council, subject to the inclusion of an improved agreement in relation to surface and foul water drainage.**
- 2. That the Council supports and welcomes the commitment to continued co-operative working and periodic review of the framework.**

The meeting ended at 11.27 am.

Chairman

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Declarations of Interest at Meetings

When declaring an interest at a meeting, Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest Members are required to identify the nature of the interest and the agenda item to which it relates. In the case of other interests, the member may speak and vote. If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed. If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting.

Have you declared the interest in the register of interests as a pecuniary interest? If Yes, you will need to withdraw from the room when it is discussed.

Does the interest directly:

1. Affect yours, or your spouse / partner's financial position?
2. Relate to the determining of any approval, consent, licence, permission or registration in relation to you or your spouse / partner?
3. Relate to a contract you, or your spouse / partner have with the Council
4. Affect land you or your spouse / partner own
5. Affect a company that you or your partner own, or have a shareholding in

If the answer is "yes" to any of the above, it is likely to be pecuniary.

Please refer to the guidance given on declaring pecuniary interests in the register of interest forms. If you have a pecuniary interest, you will need to inform the meeting and then withdraw from the room when it is discussed. If it has not been previously declared, you will also need to notify the Monitoring Officer within 28 days.

Does the interest indirectly affect or relate to any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?

If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.

Is the interest not related to any of the above? If so, it is likely to be another interest. You will need to declare the interest, but may participate in discussion and voting on the item.

Have you made any statements or undertaken any actions that would indicate that you have a closed mind on a matter under discussion? If so, you may be predetermined on the issue; you will need to inform the meeting and when it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.

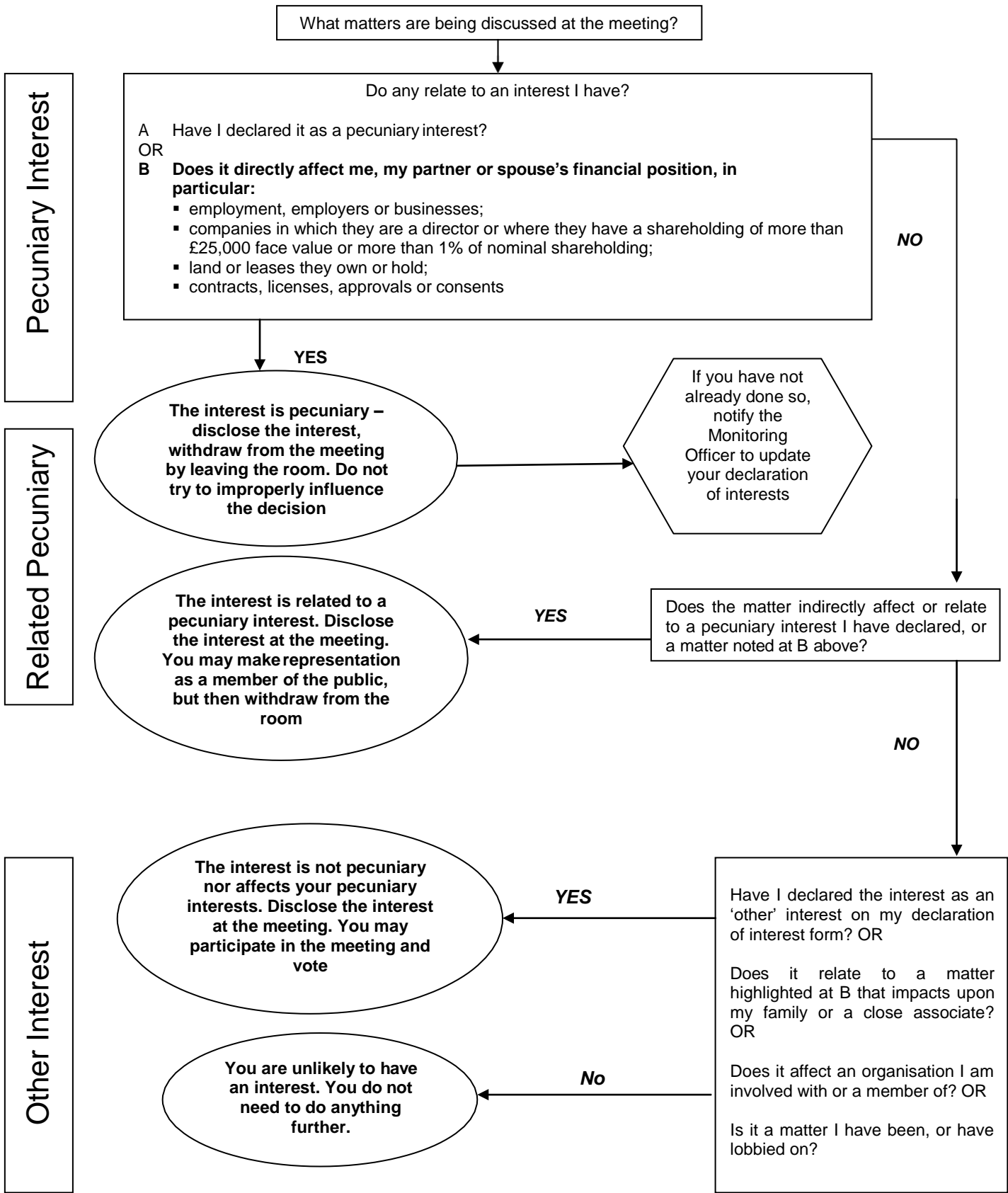
FOR GUIDANCE REFER TO THE FLOWCHART OVERLEAF

PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER IN THE FIRST INSTANCE

DEVELOPMENT COMMITTEE MEMBERS SHOULD ALSO REFER TO THE PLANNING PROTOCOL

Declarations of Interest at Meetings

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Local Plan Draft Policy Approaches to Sustainable Development.

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to endorse the policy approach concerning matters of sustainable development.

Recommendations: **It is recommended that Members endorse the revised Policy below, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager:**

SD7 – Renewable and Low Carbon Energy

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email:	
Caroline Dodden, Senior Planning Officer, 01263 516310 Caroline.dodden@north-norfolk.gov.uk	
Iain Withington, Planning Policy Team Leader, 01263 516034 Iain.Withington@north-norfolk.gov.uk	

1. Introduction

- 1.1 The emerging North Norfolk Local Plan has been subject to public consultation at regulation 18 stage during May and June 2019. This report is one of a number of reports that seeks to finalise the draft Local Plan policy approach in relation to consideration of the consultation responses and the finalisation of the supporting evidence. At the end of the process a revised Draft Local Plan incorporating justified modifications will be produced for the authority in order to consult at Regulation 19 Draft Plan publication stage ahead of subsequent submission for examination. At such a stage the Plan will be subject to consideration by an independent inspector against a number of legal tests and soundness tests to determine if it is legally compliant, justified, effective, and has been positively prepared. A binding report will be produced, which will determine if the Draft Plan is sound, with or without further modifications, following which the Plan can be formally adopted by the Council.
- 1.2 **The purpose** of this report, is following a review of regulation 18 consultation feedback, to seek Members endorsement of one of the emerging policies that address matters concerning the wider principle of sustainable development with regard to future Plan-making ahead of Regulation 19 consultation and the submission of the Plan.

2. Background and Update

- 2.1 This policy will form part of the wider suite of policies within the sustainable development /climate change section of the emerging Local Plan. As part of the review of the policy, it has not only been necessary to take account of consultation feedback, but also to ensure that the emerging policy aligns with national guidance contained within the National Planning Policy Framework (NPPF) and national Planning Practice Guidance (PPG).
- 2.2 The purpose of Policy SD7 is to help increase the use and supply of renewable energy and low carbon energy.

3 Feedback from Regulation 18 consultation

- 3.1 All of the Regulation 18 consultation feedback has been published in the Schedule of Responses, previously reported to Members. For information, the feedback for this draft policy is contained within Appendix 1 to this report and summarised below. Overall, the number of responses to the policy was quite limited, but the respondents did raise some relevant issues. The comments are summarised below for the draft policy:

Policy SD7: Renewable Energy Development

- 3.2 **Individuals:** One objection, one of support and one general comment was received. One supporting that onshore wind turbines should be discouraged due to their inherent impact on the appearance and character of the countryside and that solar farms should be limited and should be screened by hedging. The objection states that Norfolk is extremely suitable for onshore wind power, which is an obvious way to cut carbon emissions. The general comment requests that the policy wording is unnecessarily negative and that it should be amended to read, Proposals for renewable energy should be 'encouraged' rather than 'permitted'.
- 3.3 **Parish & Town Councils:** One objection from Kelling Parish Council was received, stating that the policy justification and wording was too general, offering little specific protection against future inappropriate onshore wind turbine development. This does not seem to accord with the Landscape Sensitivity Assessment, which found that there are no landscapes in North Norfolk that score 'low' or even 'low-moderate' sensitivity to commercial wind energy developments. The policy should offer more prescribed protection, in consideration of the valued landscape and local community.
- 3.4 **Statutory Bodies and Organisations:** One objection, three responses in support and three general comments were received. Comments from a housing developer and Norfolk Wildlife Trust include that the policy wording needs to better accord with the Vision and Aims and Objectives statements in the Plan and take more account of the declared climate change emergency, in order to provide more positive support for renewable energy provision. The latter organisation recommends that the policy should provide support for other renewable energy opportunities in new development, such as solar panels on new build roofs. This is also reiterated by the Environment Agency who refer to encouraging alternative heating systems as well. Natural England include

recommendations that renewable energy projects are considered strategically in terms of timings of works, particularly for cable lines and grid connections, in order to minimise disturbance and highlighting that Policy ENV4: Biodiversity & Geology should be referenced in this Policy to ensure delivery of green infrastructure.

4. National Policy

4.1 The revised National Planning Policy Framework (NPPF) was published in February 2019, which is supplemented by the National Planning Practice Guidance (PPG), an online resource providing guidance on the NPPF's implementation. Section 14 of the NPPF covers climate change, flooding and coastal change. The most relevant climate change paragraphs of the NPPF and sections of the PPG are reproduced below for information and context.

4.2 NPPF paragraphs:

151. To help increase the use and supply of renewable and low carbon energy and heat, plans should:

a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

152. Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.

153. In determining planning applications, local planning authorities should expect new development to:

a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and

b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

154. When determining planning applications for renewable and low carbon development, local planning authorities should:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and

b) approve the application if its impacts are (or can be made) acceptable (49).

Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

*(49) Except for applications for the repowering of existing wind turbines, a proposed **wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan**; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.*

4.3 PPG paragraphs

Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.

(Paragraph: 001 Reference ID: 5-001-20140306)

There are no hard and fast rules about how suitable areas for renewable energy should be identified, but in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts. The views of local communities likely to be affected should be listened to.

When identifying suitable areas it is also important to set out the factors that will be taken into account when considering individual proposals in these areas. These factors may be dependent on the investigatory work underpinning the identified area.

....In considering impacts, assessments can use tools to identify where impacts are likely to be acceptable. For example, landscape character areas could form the basis for considering which technologies at which scale may be appropriate in different types of location. Landscape Character Assessment is a process used to explain the type and characteristics of landscape in an area.....

Identifying areas suitable for renewable energy in plans gives greater certainty as to where such development will be permitted. For example, where councils have identified suitable areas for large scale solar farms, they should not have to give permission outside those areas for speculative applications involving the same type of development when they judge the impact to be unacceptable.

In the case of wind turbines, a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan.

(Paragraph: 005 Reference ID: 5-005-20150618)

Community initiatives are likely to play an increasingly important role and should be encouraged as a way of providing positive local benefit from renewable energy development....

(Paragraph: 004 Reference ID: 5-004-20140306)

[Suitable areas](#) for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines or similar will not be sufficient.

(Paragraph: 032 Reference ID: 5-032-150618)

Policies based on clear criteria can be useful when they are expressed positively (ie that proposals will be accepted where the impact is or can be made acceptable).

(Paragraph: 007 Reference ID: 5-007-20140306)

5. Policy Context

- 5.1 An initial steer was given by the Members at the November 2017 Working Party to what might be considered an appropriate way to manage wind energy development through the emerging Local Plan and exploring the potential policy approaches that the Local Plan could take in identifying suitable areas for wind energy development. The preferred approach was to develop a policy approach based around the identification of high value landscape /designations where there would be policy prohibition of wind turbines in these areas and a criteria based policy to aid in the determination of applications for those outside of the sensitive area. It was also recognised that further evidence would be required to help differentiate between sensitivity of landscape types. Members also requested that a number of former airfields be evaluated in terms of landscape impacts.
- 5.2 The resulting draft Policy was presented to Working Party in January 2019. This highlighted that the whole of the North Norfolk District was suitable for wind energy technology in terms of wind speed and it concluded that the preferred policy approach was for the identification of valued landscape /designations where there would be prohibition in the policy for large scale wind turbines in these areas and a criteria based policy to aid in the determination of applications for those outside of the sensitive area.
- 5.3 The 2021 Landscape Sensitivity Assessment (LSA) SPD, provides the appropriate evidence and justification as it assesses the North Norfolk landscape's sensitivity to various types of renewable and low carbon development, including large (80m hub, 130m tip), medium (60m hub, 100m tip) and small (30m hub, 45m tip) scale wind turbines in relation to the different Landscape Character Types (LCT).

5.4 Table 5.1 from LSA showing sensitivity ratings for typical scales of development by LCT:

LCT	Large scale wind		Medium scale wind		Small scale wind		Solar PV		Onshore cable routes		Industrial type dev		Reservoir	
	OUT AONB	IN AONB	OUT AONB	IN AONB	OUT AONB	IN AONB	OUT AONB	IN AONB	OUT AONB	IN AONB	OUT AONB	IN AONB	OUT AONB	IN AONB
Rolling Open Farmland	H	H	MH	H	M	H	MH	H	M	MH	M	H	M	MH
Tributary Farmland	H	H	MH	H	M	H	MH	H	M	MH	M	H	M	MH
Low Plains Farmland	H		MH		M		M		M		M		M	
River Valleys	H	H	H	H	MH	H	H	H	MH	H	MH	H	MH	H
Settled Farmland	H		MH		M		M		M		M		M	
Coastal Plain	H	H	MH	H	M	H	M	H	LM	MH	M	H	M	MH
Coastal Shelf	H	H	H	H	MH	H	MH	H	MH	MH	MH	H	MH	MH
Wooded Ridge	H	H	H	H	MH	H	MH	H	MH	H	MH	H	MH	H
Rolling Heath & Arable		H		H		H		H		MH		H		MH
Drained Coastal Marshes		H		H		H		H		H		H		H
Open Coastal Marshes		H		H		H		H		H		H		H

5.5 Table 5.1 from the LSA, above, indicates that large scale wind energy development would have high sensitivity across all of the Landscape Types in the District and that medium scale wind energy development is classed as having high sensitivity in the AONB along with the LCT's of Coastal Shelf, Wooded Glacial Ridge and River Valleys. The remaining LCT's score

moderate-high sensitivity for the medium scale wind development. Proposed small scale wind energy development would also have high sensitivity within the AONB, but moderate or moderate-high across the LCT's outside the AONB.

5.6 It is also noted that the Table shows the relative high sensitivity to all renewable energy development types apart from onshore cable routes and reservoirs, within the AONB.

5.7 Table 5.2 from the LSA showing sensitivity ratings for typical scales of renewable energy development by airfield

Airfield (LCT)	Large scale wind	Medium scale wind	Small scale wind	Solar PV	Onshore cable routes	Industrial type dev	Reservoir
West Raynham (ROF)	MH	M	LM	L	L	L	LM
Sculthorpe (ROF)	MH	M	LM	L	L	L	L
North Creake (ROF)	H	H	MH	LM	LM	M	M
Little Snoring (TF)	MH	M	LM	M	LM	M	M
Langham (TF)	H	H	MH	M	M	MH	M
Coltishall (LPF)	MH	MH	M	LM	LM	LM	LM

5.8 Table 5.2 of the LSA sets out the sensitivity for wind energy development of different scales and other types of renewable energy development within a range of airfields across the District. It shows that large scale (80m hub, 130m tip) wind turbines would have high or moderate-high sensitivity for all the airfields. For medium scale (60m hub, 100m tip) wind turbines, North Creake (close to the AONB) and Langham (within the AONB) are classified as high sensitivity and Coltishall classified as moderate-high sensitivity. The remaining areas of the District are classified as moderate sensitivity. Finally, for small scale (30m hub, 45m tip) wind turbines, the majority of the District is classified as having low- moderate sensitivity, but North Creake (close to the AONB) and Langham (within the AONB) are classified as moderate-high and Coltishall is identified as moderate sensitivity. The remaining airfields are classified as low-moderate.

5.9 It is clear from Table 5.2 that landscape sensitivity is typically lower for airfields within the district, although there is still relatively high sensitivity for large and medium scale wind energy developments in some of the LCT's.

5.10 The above evidence led to the Regulation 18 draft wording for Policy SD7 to support the principle of wind energy development for proposals that lie outside of an area classified as having high sensitivity within the LSA where it can be demonstrated that the landscape sensitivity for the proposed scale of turbine

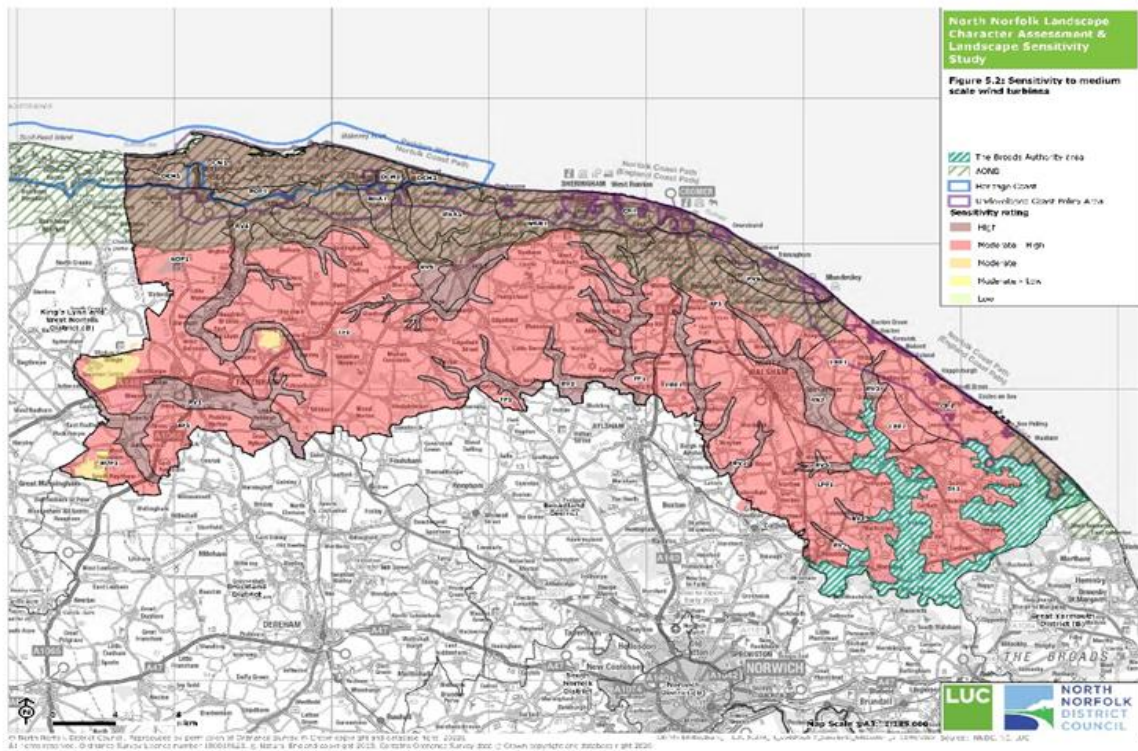
does not exceed 'Moderate- High'. This sensitivity classification maintains opportunities for wind energy development of up to 60m hub/100m tip height across the least sensitive parts of the District. And as a consequence gives directs development within the area identified as suitable for wind energy development but all proposals will still need to be assessed against the landscape evidence base and the comprehensive criteria based policy.

- 5.11 This policy approach did not identify suitable areas in the district where the principle of renewable energy, including wind energy, development would be acceptable, which does not accord with the aims of paragraph 151(b) of the NPPF, where the footnote clearly states that 'a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan...'

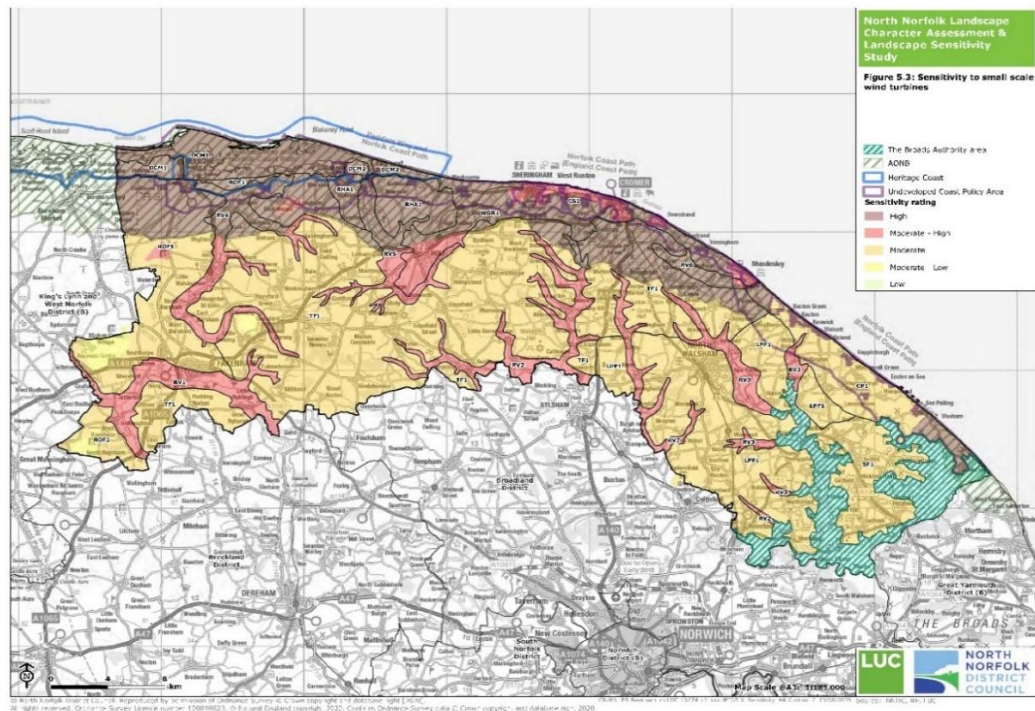
6. Conclusions for Policy SD7: Renewable Energy Development

- 6.1 Since the Regulation 18 version of the Policy was drafted the government has committed to a legally binding target requiring the country to be net carbon zero by 2050 and the Council has declared a Climate Emergency coupled with the positive implementation of a Green Agenda including the commitment to the production of an Environmental Charter. Combined, these are considered to raise the importance of providing a positive approach to renewable energy development in the district.
- 6.2 In addition, the content of the limited amount of consultation feedback is an overall desire to have a clear and more positively worded policy that would still provide the necessary strong protection to the most valued areas of the natural and built environment, to the amenity of local communities and to the biodiversity of the district.
- 6.3 In response to the above, the policy has been more positively worded to encourage the principle of all types of renewable energy development, including any brought forward through community-led initiatives - Linking with Policy SD 2. Proposals will be supported where the site is not located in an area that does not exceed 'moderate-high' sensitivity within the LSA document. It is considered that this approach is more even-handed in protecting the most sensitive landscape features if the district across the different types of renewable energy than the previous draft of the policy. As such the policy is also considered less likely to be amended at examination in relation to alignment to national policy.
- 6.4 The policy wording has also been amended to better align with the paragraph 154(b) of the NPPF, which states that local authorities should 'approve the application if its impacts are (or can be made) acceptable.' As such, the wording has been adjusted so that renewable energy proposals would need to demonstrate that any individual or cumulative adverse impacts have been 'satisfactorily mitigated.'
- 6.5 The policy wording retains a criteria based element where any proposal would need to demonstrate its suitability against all of these requirements. This has been amended to provide one common list of criteria for all renewable development types, which has been expanded to include the special qualities of nationally and internationally designated conservation sites, habitats and biodiversity.

- 6.6 In order to be clear, the last paragraph of the policy has been altered to ensure that all wind energy proposals link to an identified area in line with NPPF 154(b) Any such proposal will need to be informed by the relevant map, which identifies the broad areas that fall within the Low to Moderate-High sensitivity ranges. This map will be based on the two wind energy maps currently referenced as Figures 5.2 and 5.3 in the LSA. These are included below for information.
- 6.7 Figure 5.2 of the LSA below, where the areas indicated in light red and yellow would be suitable, in principle, for medium scale wind energy development.



- 6.8 Figure 5.3 of the LSA below, where the areas indicated in light red and yellow would be suitable, in principle, for small scale wind energy development.



- 6.9 Overall, it is concluded that the revised policy, as set out in Appendix 2, will provide a positively worded and balanced approach to future renewable and low carbon energy development within the district.

7. Recommendations

- 7.1 It is recommended that Members endorse the revised Policy below, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policy to the Planning Manager:

SD7: Renewable and Low Carbon Energy

8. Legal Implications and Risks

- 8.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its policy approaches must be justified and underpinned by up to date and proportionate evidence, the application of a consistent methodology and take account of public feedback and national policy and guidance.
- 8.2 The statutory process requires records of consultation feedback and a demonstration of how this has informed plan making with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22.

9. Financial Implications and Risks

- 9.1 Failure to undertake plan preparation in accordance with the regulations and NPPF is likely to render the plan 'unsound' at examination and result in the need to return to earlier stages. Substantial additional costs would be incurred.

Appendices

Appendix 1 – Schedule of Representations

Appendix 2 – Revised Draft Policy Approach

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Appendix 1 - Schedule of Representations

Extract of Report of Representations Regulation 18 responses

References to 'OFFICER SUMMARY' indicate that lengthier submissions were made and have either been summarised or separated out into relevant policy or site areas. The original representation can be viewed in full by searching the LP ref number at: <http://consult.north-norfolk.gov.uk/portal>

Policy SD7 - Renewable Energy

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD7	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Norfolk already makes a large contribution to renewable energy through the offshore wind farms along the coast- more than inland counties. The building of land based turbines and their inherent impact on the appearance and character of the countryside should be discouraged whilst there remains the ability to construct turbines offshore. Solar farms are also unsightly and completely uncharacteristic of the county. Steps should be taken to limit their development, particularly as land is required for agriculture. Reduction in the amount of land available for agriculture puts more pressure on the land that is remaining and encourages intensive farming to maintain yields. This results in poor environment and bio diversity and loss of habitat for wildlife. Solar farms should have surrounding hedges and appropriate wildlife (insect) friendly planting. They should not just be grassed over. Rain water run-off from the panels should be used for agriculture. Onshore wind turbines should be discouraged. Should limit Solar Farms Solar Farms should have surrounding hedges and appropriate wildlife (insect) friendly planting.
SD7	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Norfolk is extremely suitable for onshore wind power, as shown by our history of windmills. Wind power is an obvious way to cut carbon emissions and could be used to offset schemes. One of the first actions of this new council should be to stop the court actions which have used tax payers' money to delay two mid-sized turbines for years, after they had twice been given permission by government inspectors. Wind power is an obvious way to cut carbon emissions
SD7	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: This policy to be unnecessarily negative. Like to see the wording read "Proposals for renewable technology ... will be encouraged..." rather than "permitted".

Individuals	Number Received	Summary of Responses (Policy SD7)
Summary of Objections	1	One objection received, Norfolk is suitable for onshore wind power and this is an obvious way to cut carbon emissions.
Summary of Supports	1	One supports this policy, raises concerns over the impact of wind turbines on the appearance and character of the countryside and the impact of solar farms on biodiversity. Suggest that hedges should be planted to retain wildlife.
Summary of General Comments	1	One comment, consider policy to be unnecessarily negative. Like to see the wording read "Proposals for renewable technology ... will be encouraged..." rather than "permitted". Support for wind power as an obvious way to cut carbon emissions promoted.
Overall Summary		Mixed comments for this approach, seek to discourage onshore wind turbines and limit solar farms due to impact on the appearance and character of the countryside, agricultural land and on biodiversity. Suggest that hedges should be planted to retain wildlife around solar farms. However other comment that the policy is unnecessarily negative and there should be more support for onshore wind turbines in the district, to help cut carbon emissions. Suggested wording change "Proposals for renewable technology ... will be encouraged..." rather than "permitted".
Council's Response		Comments noted: The policy approach is one that emphasises the importance of the landscape and recognises its sensitivity to wind turbine development of all scales. The approach has been informed by the 2019 landscape Character Assessment and Landscape Sensitivity Study.

Parish and Town Councils

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD7	High Kelling Parish Council (1210779)	LP147	Object	North Norfolk actively supports renewable energy with existing on-shore solar and off-shore wind farms. In addition, the proposed Hornsea 3 and Vattenfall wind farms off the Norfolk coast are projected to meet 10%+ of current domestic UK energy demand. The scale of proposed off-shore development is such that there are suggestions to install a ring main at sea rather than separate pipe lines on land for each new wind farm. Support for renewables does not mean approving every development regardless of its impact on the environment and local community and at the expense of a unique landscape and skyline loved and valued by residents and visitors. There is a long-running planning dispute about applications for two wind turbines between Holt and Sheringham just outside the AONB boundary. North Norfolk District Council is be applauded for continuing to object to these turbines. Unfortunately the section in the Local Plan on Renewable Energy and Policy SD7 is depressingly general, offering little specific protection against future inappropriate on-shore	Disagree (partly): The policy approach is one that emphasises the importance of the landscape and recognises its sensitivity to wind turbine development of all scales. Offshore development is beyond the scope of this local plan and falls under national significant infrastructure. Permission is however required for proposals that require associated on land infrastructure. The approach has been informed by the 2019 landscape Character

				wind turbine development. This is surprising in that the North Norfolk Landscape Sensitivity Assessment “found that there are no landscapes in North Norfolk that score ‘low’ or even ‘low-moderate’ sensitivity to commercial wind energy developments” (Observations on Landscape Sensitivity to Wind Energy Development Para 5.8)	assessment and landscape sensitivity Study.
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Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD7)
Objection	1	1 comment received advising that support for renewables should consider landscape and the local community and that the policy approach should offer more prescribed protection.
Support	0	
General Comments	0	

Organisations and Statutory Bodies

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council’s Response
SD7	Broads Authority (321326)	LP806	General Comments	Supporting text 7.58 – needs to mention the Broads. • SD7 – is para 3 (in the case of...) actually allocating land for wind power?	Concerns Noted: Consider feedback in the development of this policy
SD7	Environment Agency (1217223)	LP452	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy SD 7 – Renewable Energy Policy SD 7 could be further enhanced by encouraging all new developments should have some form of renewable energy or heating system. The solution should be appropriate for the development and setting and have no adverse effects as listed within the bullet points in the policy.	Noted: Consider comments in the development the policy.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD7	Natural England (1215824)	LP711	General Comments	<p>We agree that applications relevant to this policy should consider impacts to the special qualities of the Norfolk Coast AONB. Potential impacts to designated sites should be considered and appropriately assessed both alone and in combination with any other plans or projects. Impacts to Sites of Special Scientific Interest and Marine Conservation Zones should be evaluated where necessary. We strongly advise that projects likely to negatively impact the Cromer Shoal MCZ are avoided. We recommend that renewable energy projects are considered strategically in terms of timing of works, in particular cable lines and grid connections to minimise disturbance. Air quality impacts should be considered both during construction and decommission, specifically the effects on local roads within vicinity of the proposal on nearby designated nature conservation sites. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species. The results of the assessment should inform updates to the HRA and SA, both of which will need to identify appropriate mitigation to address any predicted adverse impacts to the natural environment, including statutorily designated sites. Net gain is embedded in the Governments 25 Year Environment Plan (25YEP) as a key action for ensuring that land is used and managed sustainably. National Infrastructure Projects can make a significant contribution to delivering the environmental ambition in the Government's 25 YEP through net gain. We advise Policy EN4 is referenced in Policy SD 7 to facilitate delivery.</p>	Noted: Consider comments in the development of the policy.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD7	Creeting and Coast, Mr John Fairlie (1217414)	LP520	Object	<p>The renewable energy policy should reflect the Council's declaration to become a zero carbon District and the Council's declared 'Climate Emergency'. As such terminology within the Policy needs to be more carefully worded. In its draft form, this Policy is unreasonable and restrictive. Significant effects on visual amenity can be perceived as beneficial, adverse or neutral and this depends largely on the perceptions and opinions of the individual receptors and, to a certain extent, on the type of development proposed. The polarisation of public opinion on renewable energy is such that it is difficult to define significant changes in a view as having a definitely beneficial or definitely adverse effect on visual amenity for all members of the public who may experience that view. It is widely accepted that it would be impossible to locate a renewable energy development without some significant effects on landscape character and/or visual amenity. Applications for renewable energy developments that are accompanied by an LVIA will define a threshold of significance, and this would never be zero. However significant effects are not necessarily adverse, and adverse effects are not necessarily unacceptable. As such terminology within the Policy needs to be more carefully worded in particular 'no significant adverse effects'. Without this amendment the policy is unreasonable and restrictive. The policy reiterates footnote 49 of the NPPF, as this is already stated within the NPPF it does not need to be repeated. If the Council choose to quote this footnote, then it should also define what it means by 'affected local community' and how it will establish that a proposal has the 'backing' of the local community. To reflect the NPPF it should also ensure that the policy does not restrict the repowering of existing wind energy sites. Insert the word 'unacceptable' prior to significant adverse effects in both cases where it</p>	Noted Consider comments in the finalisation of the policy. The policy approach is one that emphasises the importance of the landscape and recognises its sensitivity to wind turbine development of all scales. The approach has been informed by the 2019 landscape Character assessment and landscape sensitivity Study.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				is raised in the Policy. Delete the phrase 'All planning applications for wind turbines should demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal should have their backing. SD7 does not reflect the repowering of existing wind turbines in line with the NPPF. It is suggested that this line is removed	
SD7	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP486	Support	We support the delivery of environmental infrastructure and the need to reference the mitigation and monitoring strategy.	Support welcomed
SD7	Historic England (1215813)	LP705	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Welcome the reference to heritage assets and their settings	Support noted
SD7	Norfolk Wildlife Trust (1217447)	LP691	Support	Recognising the impacts of climate change on wildlife, we are concerned that the renewable energy policy does not provide sufficient support for renewable energy provision. In the Vision, it states that 'the challenge for the Local Plan is to devise ways to ensure that the carbon footprint of existing and new development is reduced'. However, whilst the policy text starts with support for renewable energy proposals, the majority of the policy (and the supporting text) appears to focus on the range of circumstances where wind energy would not be permitted. This does not appear to be a progressive policy which would encourage the uptake of renewable energy provision in the district over the plan	Noted- consider amendments to the renewable energy policy to include targets for energy efficiency improvements and renewable energy provision aligned with national targets set by the government and in line with the best practice to include support and highlight opportunities for other forms of

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>period, and misses opportunities to support community scale renewable energy provision such as solar panels on new buildings. The government carbon reduction targets set out in the 2008 Climate Change Act committed the UK to an 80% reduction by 2050, Recent government targets have committed the country to net zero carbon by 2050, with five-yearly carbon budgets to 2032, from when a target reduction below 1990 levels of 57% is set. Subsequent to the publication of the draft plan, the government has now committed to a net zero carbon target by 2050. In order to contribute to national targets, we recommend that the plan sets targets for energy efficiency and renewable energy generation (e.g. the Merton rule) in order to provide clear support for these measures in the plan. Positive examples of existing and draft policies that could be used as models can be found in the 'Rising to the Climate Crisis – A guide for local authorities on planning for climate change' report produced in 2018 by the Town & Country Planning Association and the Royal Town Planning Institute. For example, draft policy GM-S 2 of the Greater Manchester Spatial Framework Revised Draft 2019 sets an aim of delivering a carbon neutral plan area by no later than 2038, supported by measures including the promotion of retrofitting existing buildings to improve energy efficiency and generate renewable or low carbon energy, increasing carbon sequestration through restoration of habitats and tree-planting and seeking carbon reductions in new dwellings. We are concerned that the renewable energy policy does not match the aspirations in the Vision and Aims & Objectives, and will not result in any significant reductions in the carbon footprint of existing or new development. Suggested Change: We recommend that the renewable energy policy is revised to include targets for energy efficiency</p>	<p>renewable energy compatible with new development such as solar panels on new build roofs. Consider the extent to which these are covered within the North Norfolk Design Guide and/or consider the need to refer to this guide within the policy itself.</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				improvements and renewable energy provision, aligned with national targets set by the government, and in line with best practice established by other local authorities, and to include support and highlight opportunities for other forms of renewable energy compatible with new development, such as solar panels on new build roofs. This would allow the Council to demonstrate that the plan will result in a reduction in carbon emissions and an increase in the renewable energy provision in the District.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD7)
Objection	1	Key issues raised including the linking of policies to ensure delivery and consistency (ENV4/ SD7) and that the approach needs more careful wording to accord more closely with the declared climate change emergency and not to be seen as unreasonable and restrictive in order to provide more support for renewable energy provision.
Support	3	
General Comments	3	

Alternatives

SD7	Mr & Mrs Johnson (1215700)	AC015	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Partially Supports Assessment of SD7 - Norfolk already makes a large contribution to renewable energy through the offshore wind farms along the coast- more than inland counties. The building of land based turbines and their inherent impact on the appearance and	Comments noted: This comment repeats the support SD7 made against the First Draft Local Plan (Part 1).
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			<p>character of the countryside should be discouraged whilst there remains the ability to construct turbines offshore. Solar farms are also unsightly and completely uncharacteristic of the county. Steps should be taken to limit their development, particularly as land is required for agriculture. Reduction in the amount of land available for agriculture puts more pressure on the land that is remaining and encourages intensive farming to maintain yields. This results in poor environment and bio diversity and loss of habitat for wildlife. Solar farms should have surrounding hedges and appropriate wildlife (insect) friendly planting. They should not just be grassed over. Rain water run-off from the panels should be used for agriculture.</p>	
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Renewable and Low Carbon Energy

The purpose of this policy is to help increase the use and supply of renewable energy and low carbon energy and heat.

In June 2019, the government committed to a legally binding target requiring the country to be net zero carbon by 2050. The updated NPP Framework requires that Local Plans develop a positive strategy to promote energy generation from renewable and low carbon sources. The Framework encourages Local Plans to maximise renewable and low carbon energy development, while ensuring that adverse impacts are addressed satisfactorily and to consider identifying suitable areas for development, and support community-led initiatives for renewable and low carbon energy.

The Framework states that when determining planning applications for renewable and low carbon development, local planning authorities should approve the application if its impacts are (or can be made) acceptable.

North Norfolk declared a Climate Emergency in 2019 and with the implementation of a Green Agenda and the production of an Environmental Charter, renewable energy alternatives and the move towards low carbon energy sources are at the forefront of future plans for North Norfolk and an integral part of achieving net zero

Whilst the Council is keen to support renewable energy developments, ~~these~~ such developments can have ~~significant negative effects~~ adverse impacts on the natural and built environment, as well as residential amenity, all of which, ~~and these~~ needs to be carefully managed. There is a need to ensure sufficient protection for the distinctive and sensitive landscape and environment in North Norfolk.

The North Norfolk Landscape Sensitivity Assessment SPD (LSA) (adopted January 2021) Study, 2018 (LSS), provides evidence and context for policies within the Draft Plan and has been used to inform the draft Renewable Energy policy and to assist in the identification of potentially suitable areas for all types of renewable energy development wind turbines. The LSA S uses the updated 2018 adopted Landscape Character Assessment 2021 (LCA) as the basis for identifying the overall sensitivity to different renewable energy developments for each Landscape Character Type (LCT) , and in the Area of Outstanding Natural Beauty (AONB) and airfields, indicating areas that may will be more or less sensitive in the landscape, ranging from high to low sensitivity.

In order to provide greater certainty in providing opportunities for renewable energy development, whilst protecting sensitive landscape character types within the district, the policy directs proposals for all types of renewable energy development to be located within areas of the district that do not exceed 'Moderate- High' within the LSA sensitivity classification. Careful consideration will also be needed in areas close to High sensitivity landscapes, such as the AONB, Heritage Coast and Undeveloped Coast and the cumulative impacts of an increasing number of renewable developments within an area.

In addition to this spatial aspect, all proposals will be assessed against a comprehensive set of criteria and also seeks conditions around the restoration of a site if a renewable energy development is subsequently removed.

Onshore Wind Energy

The PPG states that proposals for wind energy development should not be considered acceptable unless it is located in an area identified as suitable for wind energy development in Local or Neighbourhood Plan and, following consultation, it can be demonstrated that the

planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.

Wind energy development proposals will be supported in principle where it can be demonstrated that the landscape sensitivity for the proposed scale of turbine does not exceed 'Moderate- High'. This sensitivity classification maintains opportunities for wind energy development of up to 60m hub/100m tip height across the least sensitive parts of the District. All proposals should complement the particular characteristics of the surrounding landscape and the LCA will assist in assessing the impact of individual proposals.

Offshore Wind Energy

In November 2020, the government published The Ten Point Plan for a Green Industrial Revolution, which sets out the ten areas that are being promoted in order to achieve the net zero carbon target by 2050. Point 1 relates to the aim of quadrupling offshore wind capacity and by 2030, the aim is to produce 40GW of offshore wind, including 1GW of innovative floating offshore wind in the windiest parts of our seas. As such, there is considerable potential for offshore wind power to contribute to renewable energy production and while offshore proposals are not subject to local authority planning consent, permission is required for the associated on-land infrastructure, including cable routes. To date, North Norfolk has positively embraced offshore wind developments in the North Sea. However, there is concern about the potential increasing number of cable corridors and grid related infrastructures, including substations and cable relay stations, being proposed by offshore wind developments, due to the potential loss of landscape features and habitats and their cumulative adverse impacts. Consequently, the Council is encouraging and supportive, at a National level, of the development of an Offshore Ring Main, to minimise the construction impacts on the coastal region in the short term and to rationalise grid connections for greater efficiency in the long term. An Offshore Ring Main would connect to the National Grid through one single cable connection, potentially saving the North Norfolk countryside from widespread infrastructure works delivered over many years. These applications will be determined in line with the criteria contained in the policy below.

Solar Photovoltaic Farms

Field- sized solar farms provide an opportunity for greater energy production as well as potential enhancement to biodiversity, but it is important that they are carefully planned and screened to ensure any amenity and visual impacts are minimised. The PPG encourages the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value. Where a proposal involves greenfield land, it will also need to be demonstrated that the proposed use of any agricultural land has been shown to be necessary, that poorer quality land has been used in preference to higher quality land and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays

Anaerobic Digestion (AD) plants

AD plants can be classified into two general categories: those that process predominantly agricultural feedstock (such as manures, slurries, crops and crop residues); and those that use predominantly municipal, commercial and industrial waste streams as feedstock. The biogas produced can either be burned on-site to generate heat and/or power (Combined Heat and Power – CHP); or upgraded to biomethane for injection into the national gas grid.

Anaerobic Digestion proposals are regarded as waste treatment facilities, where feedstock is classified as waste under relevant legislation and so relevant related national and county best

practice guidance and policies will apply. Anaerobic Digestion proposals raise a number of planning issues including visual and landscape impacts arising from industrial scale plant / buildings; location concerns, in terms of sustainability relative to the source of biomass and where relevant, combined heat and power (CHP); electricity and/or gas grid connection), potential odour impacts, air emissions, noise impacts, protection of the water environment and traffic impacts.

Policy SD 7

Renewable and Low Carbon Energy

Renewable energy proposals, **including from community-led initiatives**, will be supported and considered in the context of Sustainable Development and climate change, taking account of the wider environmental, social and economic benefits of renewable energy gain and its contribution towards energy supply.

Proposals for renewable energy technology **including the landward infrastructure for offshore renewable schemes or the** integration of renewable technology on existing or proposed structures **with any** associated infrastructure, will be ~~permitted~~ **supported where the site is located in an area that does not exceed 'moderate-high' sensitivity within the Landscape Sensitivity Assessment 2021 SPD and it is demonstrated that any individual or cumulative, there are no significant adverse impacts effects on would be satisfactorily mitigated in respect of all of the following;**

- 1. the visual impacts on the surrounding landscape, townscape and ~~cumulative~~ landscape character and visual impacts; and**
- 2. the special qualities of all designated nationally important landscapes and heritage assets including their settings which must be conserved or enhanced; and**
- 3. the special qualities of nationally and internationally designated conservation sites and their qualifying features, habitats and biodiversity;**
- 34. residential and local amenity relating to {visual dominance, noise, fumes, odour, vibration, glint and glare, shadow flicker traffic generation, broadcast interference};**

~~In the case of proposals for wind energy development proposals that lie outside of an area classified as having 'high sensitivity' within the Landscape Sensitivity Assessment 2018 and there are no significant adverse effects on;~~

- ~~1.5. the cumulative impacts on air traffic safety, radar, reflected light, heritage, radar and telecommunications, or any such impacts have been adequately mitigated; and~~
- 6. there is appropriate details / mechanism in place to restore the land to its original use and the removal of the technology at the end of its generating term**
- ~~2. residential amenity in terms of shadow flicker, vibration and visual dominance; and~~
- ~~3. landscape character, unless it can be demonstrated that the impact is acceptable in accordance with the adopted landscape character evidence base.~~

The location of all planning applications proposals for wind turbines should be informed by the relevant wind energy map* detailing the suitable areas for such development and following

consultation, must demonstrate that the planning impacts identified by the affected local community have been fully addressed ~~and the proposal should have their backing.~~

*map to be based on Figs. 5.2 and 5.3 of the Landscape Sensitivity Assessment SPD

North Walsham Western Extension: Public Engagement

Summary: This report provides an outline of the upcoming public engagement approach for the Western Extension.

- Recommendations:**
1. **To approve the approach to public engagement on the emerging principles in the Western Extension Development Brief, and;**
 2. **That delegated authority is given to the Planning Policy Manager on the final timing and content of the engagement material following consultation with the Chair of the Planning Policy and Built Heritage Working Group and North Walsham Members.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
<p>Contact Officer, telephone number and email:</p> <p>Stuart Harrison, Senior Planning Officer – Planning Policy Team. Stuart.harrison@north-norfolk.gov.uk 01263 516308.</p>	

1. Introduction

- 1.1 This report provides information on the upcoming public engagement on the emerging themes the Western Extension Development Brief.
- 1.2 Officers are intending to carry out an online engagement with the public and stakeholders in May to present some of the headline principles in order to gather views on the work carried out so far and how the next stage of work could be developed.
- 1.3 Robust evidence and technical work will also inform the production of the Development Brief.

2. Background and update

- 2.1 At the December 2020 Working Party it was resolved that the Western Extension (site NW62A) should be considered as a preferred option for allocation and should be taken forward into the Regulation 19 stage of the Local Plan. The site area for the Western Extension was increased to include more land within the allocation to facilitate the delivery of the Western Link Road and increased provision of Green Infrastructure. Officers are continuing the work to produce a Development Brief.

North Walsham Link Road Feasibility Study

- 2.2 In November 2020 the North Walsham Link Road Feasibility Study was published. This evidence study was jointly commissioned by NNDC and Norfolk County Council.

- 2.3 The study concludes that the existing highway network of North Walsham will come under increased pressure as a result of traffic growth associated with the proposed development. However, the delivery of a Western Link Road (WLR) connecting to the industrial estate is expected to mitigate the traffic impacts that the growth could cause. Additionally, the WLR is expected to solve some of the existing routing issues for HGVs caused by the low bridges in the town.
- 2.4 A subsequent study has been commissioned to provide further detail on the potential link from Cromer Road, via Bradfield Road, to the industrial estate. This study will include an assessment of the works required along Bradfield Road to provide a suitable route, together with an assessment of options for the bridge across the railway.
- 2.5 This material will be published alongside the Engagement Draft of the Brief.

3. Development Brief production

- 3.1 The purpose of the Western Extension Development Brief is to provide a clear framework for the development at planning application stage and set out site-specific principles to guide development proposals. This will help ensure that any development on the site is appropriate and meets the aspirations and needs of the local community, stakeholders and the requirements of the Local Plan.
- 3.2 Preparation of the Development Brief for the Western Extension is a collaborative process between the Council, the landowners and local stakeholders. The Brief will be worked up over multiple iterations, and will ultimately go through a statutory process to be adopted as a 'Supplementary Planning Document' (SPD). Legally, an SPD does not form part of the Local Plan itself and they are not subject to independent examination, but they are material considerations in determining planning applications.
- 3.3 Paragraph 153 of the National Planning Policy Framework (NPPF) says, '*Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development*'. The requirements for producing Supplementary Planning Documents are set out in Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.4 After the upcoming informal engagement process, the Brief will be produced in draft form and will be presented to Working Party for endorsement. It will then be subject to a formal, statutory, consultation process. At the current time it is envisaged that this formal consultation (Regulation 13) will take place alongside the 'Regulation 19' publication of the new Local Plan in the summer 2021.

4. The Draft Vision Statement

- 4.1 The draft Vision Statement outlines the overarching vision for the development and will provide the high level direction for how the Development Brief content will progress.

4.2 The overarching **Vision Statement** is:

'The Vision is to provide a sustainable urban extension to North Walsham which integrates with, and positively contributes to, the existing community. The new development will promote high quality design and placemaking in the built and landscape environment. It will improve transport networks and enhance economic activity in the town. It will promote social cohesion through the provision of housing that meets a wide range of needs.

Development will be planned around a new link road, community facilities, green infrastructure and a network of interconnected streets and open spaces. It will act as a catalyst for growth, helping to successfully integrate the sustainable urban extension into North Walsham.'

4.3 The **Core Themes** in the draft Vision are:

1. Delivering high environmental standards.
2. An effective and efficient transport network including new link road.
3. A mix of homes to support a sustainable community.
4. Social and community infrastructure to create sustainable neighbourhoods.
5. Design quality.
6. To deliver an integrated masterplan and comprehensive infrastructure delivery strategy.

4.4 These core themes will be expanded and will form the main areas for engagement with the general public and stakeholders as detailed below.

5. **Engagement Process**

- 5.1 In order to ensure that we take on board the views of the North Walsham community and stakeholders early in the process, and to continue momentum on the production of the Development Brief, we believe it is important to undertake engagement as soon as possible to inform the next stage of work.
- 5.2 Engagement with the public and stakeholders in a time of social distancing and Covid-19 restrictions provides a challenge to how we are able to communicate and consult with our local community.
- 5.3 The Government's 'Roadmap out of lockdown' provides a four-step roadmap that offers a route back to a more 'normal life' by mid-summer. However, it is still likely that ongoing restrictions will mean that face to face public events, where members of the public are invited to 'drop in', may not be possible or feasible. Delaying the engagement until a point in time where restrictions are fully lifted could jeopardise the production timetable for the Development Brief and the Local Plan.
- 5.4 There is an excellent opportunity to undertake a valuable and worthwhile engagement exercise using engagement methods which don't require meeting in person. We will be using a range of media and communication methods to gather the views and thoughts of the public and stakeholders, including the following:

Website

We will produce a bespoke Western Extension engagement website that will present the emerging information regarding the key themes for the Development Brief. It will provide headline information and ask for comments via a web form.

Stakeholder Virtual Meetings

A number of meetings will be arranged with local stakeholders such as the Town Council, landowners, highways and other interested parties.

Social Media

Key messages and information on how people can get involved in the engagement will be provided through social media channels.

Telephone and video calls

Officers will make themselves available via phone and video calls during the engagement period.

Leaflet and posters

Posters will be distributed on notice boards through-out the town and leaflets will be made available for those who may not have access to the internet. All those who made representations at Regulation 18 stage of Plan preparation will receive written notification.

Engagement timetable

- 5.5 The engagement period will commence in mid-May (exact date to be confirmed) and will run for approximately 4 weeks. As this is a non-statutory part of the process and there will be a degree of flexibility in accepting comments outside the specified engagement period.
- 5.6 Engagement and dialogue will continue with all key stakeholders beyond this specific engagement exercise and draft proposals will be shared at the earliest opportunity.

6. Recommendations

- 6.1 **To approve the approach to public engagement on the emerging principles in the Western Extension Development Brief, and;**
- 6.2 **That delegated authority is given to the Planning Policy Manager on the final timing and content of the engagement material following consultation with the Chair of the Planning Policy and Built Heritage Working Group and North Walsham Members.**

7. Legal Implications and Risks

- 7.1 There are no legal implications associated with this element of work in relation to the production of the North Walsham Western Extension Development Brief.

8. Financial Implications and Risks

- 8.1 There are no financial implications or risks. Any costs associated with the delivery of these elements of work are expected to be delivered through existing budgets.