

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.

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				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

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				<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>

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				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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