



## A g e n d a

1. **To receive apologies and details of any substitute members attending.**
2. **Minutes: To receive the Minutes of the last meeting held on 13 February 2009** (Page 1 )
3. **Members to Declare any Interests**

Please indicate whether the interest is a personal one only or one which is prejudicial. A declaration of a personal interest should indicate the nature of the interest and the agenda item to which it relates. In the case of a personal interest, the member may speak and vote on the matter. Please note that if you are exempt from declaring a personal interest because it arises solely from your position on a body to which you were nominated by the County Council or a body exercising functions of a public nature (e.g. another local authority), you need only declare your interest if and when you intend to speak on a matter.

If a prejudicial interest is declared, the member should withdraw from the room whilst the matter is discussed unless members of the public are allowed to make representations, give evidence or answer questions about the matter, in which case you may attend the meeting for that purpose. You must immediately leave the room when you have finished or the meeting decides you have finished, if earlier. **These declarations apply to all those members present, whether the member is part of the meeting, attending to speak as a local member on an item or simply observing the meeting from the public seating area.**

4. **Race Bank Offshore Wind Farm Proposal, Centrica Energy Ltd** (Page )

Report by The Director of Environment, Transport and Development

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**Planning and Highways Delegations Committee**  
**Minutes of the Meeting Held on Friday 13 February**  
**2009**

**Present:** Mr A Gunson  
Mr I Monson

**Also Present:** Mr C Armes  
Mr D Baxter  
Dr A Boswell  
Mr D Callaby  
Mrs J Eells  
Mrs I Floering Blackman  
Mr J Perry-Warnes  
Mr J Rogers  
Mr A Wright

**Officers:** Mr S Faulkner – Planning and Transportation

**1. Apologies for absence:**

There were no apologies.

**2. Minutes**

The minutes of the meeting held on 15 February 2008 were confirmed as an accurate record and signed by the Chairman.

**3. Declarations of Interest**

Mr Wright declared a personal interest in item 5, as he sat on the Wash and North Norfolk Coast European Marine Site Management Group and the Wash Estuary Local Authority Member Group.

Mrs Eells declared a personal interest Item 5 as the Local Member and as a Member of the Wash and North Norfolk Coast European Marine Site Management Group.

Mr Rogers declared a prejudicial interest in Item 4, as he owned land in Breckland that had been considered in the Local Development Framework.

Mr Monson declared a personal interest in Item 4 and said that his interest was the same as he had declared at the last meeting which was as follows: he had been on the panel at Breckland District Council that discussed the Local Development Framework and he owned a site

in Breckland that was contained in the Local Development Framework (LDF).

Mr Baxter declared a non-prejudicial interest in Item 5 as a Member of the Eastern Sea Fisheries Joint Committee.

**4. Breckland District Council – Core Strategy and Local Development Control Policies Proposed Submission Document**

Mr Rogers left the room.

The annexed report by the Director of Environment, Transport and Development was received.

**Housing Numbers and Spatial Strategy**

The following comments were made:

There were concerns over the Weeting Buffer Zone as at 1.5km it was considered to be too large. As a result there could be no development in that area over the next 15 years were this to be put in the LDF. It was felt that there should be some flexibility over planned development in the buffer zone.

There needed to be some development in the Brecks, it should not all be discounted, which would be the case if the buffer zone was accepted as proposed. There were both social and environmental reasons why some development would be desirable within the area.

Members felt that the Habitat Regulation Assessment (HRA) should be carried out again by Breckland District Council to obtain a further opinion from ornithologists on the matter of the stone curlews in the area.

In response to these concerns it was noted that Breckland District Council (BDC) was required to work within the strategic framework and an HRA had been carried out by consultants who had worked with Natural England and the Royal Society for the Protection of Birds. The Principal Planner indicated that BDC had acted entirely within the prescribed regulations with regard to the assessment.

The Principal Planner confirmed that the overall numbers of houses were not affected by the HRA. Six thousand houses had been identified in the north of Thetford where the greatest impact would be seen.

There were concerns by the Local Member for Thetford East, that there would be no open spaces in Thetford as the new housing to the north of the town would mean other facilities and amenities would be squeezed in between this and the existing housing. This would also

cause congestion on the A134 into Thetford. He felt that this proposal needed to be looked at once again and that the original plan with growth all the way around the town was a better option. He felt that developments to the north of the town would be detrimental and that the 6,000 proposed houses should be reduced if the zone was to remain as it was. A 1,500 metre buffer zone would cause real problems for the town and its expansion.

Another Member felt that the matter should be revisited for an independent more informed approach and to look at how the stone curlew population might be increased.

The Chairman read out the concerns of Local Member for Swaffham, which stated as follows:

- She objected to the car parking provision of .85 per household and would prefer 1.25 having had the original proposal of 1.5 turned down.
- Public transport in the area was inadequate
- The minimum net increase of jobs to 2021 is 300-650 but she suggested 400-800 having had 750-1,000 turned down.
- The net figure of 250 new houses until 2026 shows the allocation working out to an increase of only 14/15 new dwellings per year. This would be unrealistic and restrictive on natural growth in the town. The Town Council regards the overall minimum figure should be 1600 giving a net figure of 600 houses to add to the 250 offered.
- There was a danger that the town would stagnate as the town was not large enough to sustain the shops there. There was needed a diversity of new jobs and houses to go with them to provide an element of sustainability.

In response it was stated that the County Council had not raised these issues at a previous stage. The levels of housing in Swaffham had previously been agreed by this Committee in responding to the preferred options stage. The other issues raised had been assessed at the preferred option stage and did not affect the overall soundness of the LDF.

The Local Member for Elmham and Matishall expressed concern over more development taking place in Dereham. It was noted in response that no concerns had been raised previously over the level of houses in Dereham. More houses had been proposed in Dereham Town Centre and surrounding villages, due to the fact that it was a sustainable location with plenty of jobs in the area. There were about 600 dwellings proposed in this area but the siting of them was not for discussion at this point. That would be contained in the site specific plan and would be dealt with separately.

The Cabinet Member for Waste Management and the Environment said that he was not in favour of prohibiting any growth in the areas of Munford, Weeting and Thetford for the next 15 years which would mean that even private dwellings would not be able to have extensions added to them. He proposed that Breckland District Council be asked to look again at a possible extension of the buffer zone exception areas in settlements over 1,000 people, especially bearing in mind the growth point area in Thetford.

The recommendation in 4.6 of the report was agreed,

### **Attleborough**

The proposals for Attleborough were accepted and it was requested that all infrastructure should be in place. It was suggested that more land be made available in order to make the proposals more sustainable.

The recommendation at 4.14 of the report was agreed.

### **Thetford**

Growth options in Thetford were reported. The recommendation at paragraph 4.19 was agreed.

### **Infrastructure and Service Provisions**

It was reported that a stronger policy CP 5 was needed, therefore a proposed revised policy was contained in the Appendix to the report, which took into account Norfolk County Council's Planning Standards.

The recommendation at 4.21 of the report was agreed.

It was **RESOLVED:**

To agree all the recommendations set out in the report. In addition the Committee agreed the following representation:

“That Breckland District Council be asked to re-consider the 1,500 metre buffer zone around Special Protection Areas (SPAs) with Stone Curlews, as set out in Policy CP.10 and Map 3.1, in favour of a more flexible approach to possible development in those areas adjacent to settlements with over 1,000 population. The County Council has particular concern about the impact of the currently drafted buffer zone around Thetford, since this will severely limit the options for future growth around the town, which has Growth Point status.

The Committee agreed that the buffer zones should either be reduced or a more flexible approach applied to development in such areas having regard to appropriate environmental criteria.”

In making the above comment the Committee wanted to make it clear that the County Council was not raising a “soundness objection” to the Proposed Submission Document.

In addition the Committee amended the suggested revised Policy CP.5 to refer in the bullets to “Highways and Public Transport” rather than simply “Transport”.

### **Reasons for Decision**

The level and distribution of growth as set out in the emerging Core Strategy is consistent with the adopted East of England Plan. Many of the concerns/issues previously raised, particularly in relation to reducing the number of service villages with planned housing growth have now been addressed. Major growth in Attleborough and Thetford was supported subject to the infrastructure requirements arising from the planned growth being delivered through developer funding and other possible external funding streams agreed with the infrastructure and service providers. Furthermore it is felt that the District Council should consider additional employment provision in Attleborough in order to achieve a more sustainable balance between jobs and housing

The provision of infrastructure was a major issue and it is felt that the Infrastructure Policy (CP.5) should be strengthened/clarified and the supporting text expanded to refer to the County Council’s Planning Obligations Standards. Moreover, any new policy on planning obligations ought to have regard to the preparation of an Integrated Development Programme (IDP), which would assist in identifying the infrastructure investment needed to deliver growth in the plan period and any potential shortfalls. The IDP could then be used to consider alternative funding streams in partnership with other infrastructure and service providers

On the basis of the report it was felt that no soundness objection should be raised to the Proposed Submission Document subject to the recommendations set out above being satisfactorily dealt with by the District Council ahead of formal Submission

### **Alternative Options Considered**

The report set out a number of recommendations. Not pursuing these recommendations would be contrary to the aims of the adopted East of England Plan (2008).

## **5. Docking Shoal Offshore Wind Farm Proposal – Centrica Energy Limited**

The annexed report by the Director of Environment, Transport and Development was received.

The following points were made:

- There were currently around 270 permitted offshore wind turbines which could produce 800 megawatts of energy, and power half a million homes.
- Members of the Committee felt that there would be a detrimental impact on the Cley and Brancaster landscape, tourism and nature conservation in these areas if the application went ahead.
- The Local Member for North Coast, Mr Bett had objected to the application.

Mr Baxter stated the following on behalf of the fisherman in the area:

Their main concern was that there was a lack of baseline information that had been gathered by the developers and that it was insufficient to determine whether the wind farms would or would not effect the marine ecosystem. The developers would say that they had met the requirements demanded of Defra and Cefas under their construction licenses but the concerns of the fishermen remained. It had come to light that surveys were simply used to determine what species were present. Post construction surveys would be used to determine whether there had been changes to the species populating the area around wind farms. The problem is that the surveys would not be able to determine changes in abundance. If surveys detected species before and after construction then it would be deemed that there was no negative impact from the construction. The baseline information collated for wind farms is normally one or two years.

The developers had spent considerable amounts of money in an attempt to allay the fears regarding the potential negative impact of these turbines. There were real concerns regarding the potential negative impact of these turbines. There were real concerns regarding the creation of electro magnetic fields around the cables. It was thought that the electro magnetic fields could affect sensory responses of fish. The Collaborative Offshore Wind Research into the Environment (COWRIE) had spent considerable time and money studying these potential effects. Many of the predicted impacts from the development of these wind farms were derived from sophisticated modeling. Modeling is not an exact science and there were examples where the natural environment has not adhered to predicted outcomes.

Wind farm developments undertaken by Centrica in particular have also suffered due to poor communication between themselves and fishermen. This has hampered discussions and the dissemination of important information.

The Local Member for Dersingham said that the underground cabling would affect her area and resented the application and felt that it was an unnecessary intrusion into rural life in West Norfolk. She felt that no



thought had been given to the impact on the environment when constructing and siting turbines in an area of outstanding natural beauty. There would be an adverse effect on birds and other wild life in the area. There would be untold damage to the sea bed and marine life, tide change and coastal erosion. Many people in Norfolk relied on tourism for their livelihoods like hotels and they needed support and safeguarding. The turbines would have significant effect on the most protected estuary in England.

The Local Member for Marshland North said that the cabling for the turbines would go through the Walpoles. It would affect the fish and shellfish living in the Wash. He felt that the cables would be better going into Skegness rather than the Wash but this would be more costly so he suspected that this was why it was not being proposed by the developers. Thirty turbines were already visible from Brancaster, the effect of more turbines being visible would have a major adverse economic effect on the County. It was also suggested that the erection of turbines could cause sea levels to rise.

The Local Member for Holt, raised concerns over the visual impact, stating that it would change the seascape considerably on a clear day. He had concerns over the effects on the fishing industry and tourism in the area.

The Local Member for Fakenham, was concerned that the cabling would be going through a sensitive area of the Wash and could cause problems with electro magnetic fields. He felt that if the cabling were to go through Skegness, which was deeper water then the cables would be better placed. He felt that none of the environmental concerns had been addressed by the report.

The Local Member for Nelson Ward said that he was in favour of the turbines and it would be right not to raise an objection to the proposal. He felt that there was a need to engage in discussion with the fishermen in order to protect the fishing grounds as much as possible. He felt that industry should be welcomed into Norfolk so that jobs were created locally. He said that the reason that cabling was proposed to go through the Wash was so it could connect to the National Grid. He also said that there could be economic benefits to the turbines. He stated that nuclear energy was not a feasible solution as it would not deliver the energy needed by 2020 and when it did it would only increase fuel bills.

The Cabinet Member for Waste Management and the Environment said that he was in a dilemma, as the shallow waters in the Wash where there was plenty of wind was an ideal place for the turbines, especially as they were not popular on land. The Secretary of State would be looking to reach its targets for sustainable energy by 2020 and turbines would save on fossil fuel. Landscape issues were an important part of his portfolio but the cabling needed to go through the

Wash in order that it could connect up to the super grid although he did have concerns over the fishing industry and possible problems to tides.

The Local Member for Elmham and Matishall asked that she see the process in detail so that she had a good understanding of it. The Principal Planner agree to send her the non- technical summary of the process after the meeting.

The Cabinet Member for Planning and Transportation made the following comments:

- There were 270 permitted turbines in the County which could power half a million homes, which was more than the amount of homes in Norfolk. The County could be seen as self sufficient in terms of power.
- There would only be more employment in the region whilst the turbines were being built.
- The equipment would be made in Germany so would not help the UK economy.
- The erection of the turbines would see an industrialisation of the area.
- This was a protected area of outstanding natural beauty and was prized for its open spaces and wilderness which was unique to Norfolk.
- It seemed that rules over what could and could not be built in certain areas applied to the individual personal applicant but large scale developments were allowed to go ahead.
- The impact on the fishing industry could not be proven at this point but once the application was granted the turbines could not be removed if they did have an adverse effect on the sea life.

He felt that a precautionary principle should be adopted and proposed that an objection be raised to the application on the grounds of:-

1. The scale of the proposal and the detrimental impact on an outstanding area of natural beauty.
2. That the impact on the landscape would have a detrimental effect on tourism and the local economy.
3. The proposed cable route would have a detrimental effect on a conservation area.
4. It would have a detrimental impact on the local fishing industry.

It was generally felt that the cumulative impact of the turbines would destroy the unique features of the North Norfolk countryside and coastline.

The Cabinet Member for Waste Management and the Environment said that he did not agree with the effects the turbines would have on tourism in the area. It could not be proven that it would detract tourists

from the area and felt that it could actually increase it and so he would like that reason removed from the reasons for objection.

After much debate regarding whether or not the detrimental effect on tourism should be contained in a resolution, The Cabinet Member for Planning and Transportation proposed the following **RESOLUTION**:

That the Department of Energy and Climate Change be informed that Norfolk County Council wishes to raise a strategic objection to the Docking Shoal Offshore Wind Farm on the following grounds:

1. The scale of this proposal in combination with the other permitted offshore wind farm schemes would have a detrimental impact on the North Norfolk Area of Outstanding Natural Beauty and Heritage Coast contrary to Policy ENV.2 of the East of England Plan;
2. There was concern that the landscape impact arising from this proposal on the North Norfolk Coast could have a detrimental effect on visitor numbers and the local economy contrary to the objectives set out in Policy E.6 of the East of England Plan;
3. There was concern that the proposed cable route and wind farm will have a detrimental impact on the Wash Estuary as a whole, which has a number of national and international nature conservation designations, including: RAMSAR site; National Nature Reserve; Special Protection Area (SPA); Site of Special Scientific Interest (SSSI). As such the proposal is contrary to Policy ENV.3 of the East of England Plan; and
4. There was concern that the proposal could have a detrimental impact on the local fishing industry and local economy contrary to the wider sustainable aims of Policy SS.1 of the East of England Plan.

The Cabinet Member for Waste Management and the Environment said that he could not agree to the Resolution whilst it contained paragraph 2, so he would abstain from voting on the matter.

The Committee did not request a Public Inquiry but asked that the Department of Energy and Climate Change fully take into account the County Council's concerns before determining the Docking Shoal Wind Farm proposal.

With one vote for and one abstention it was **RESOLVED** Accordingly.

### **Reasons for Decision**

The proposal would have major environmental benefits in terms of producing significant amounts of renewable energy. The Applicant's Environmental Statement indicated that the proposal could supply electricity for around 340,000 homes and lead to the reduction of up to 1.1 million tonnes carbon dioxide each year. These benefits were clearly consistent with:

- National Policy on renewable energy targets;

- Meeting the UK's Kyoto Protocol targets for reducing emissions of greenhouse gases;
- Meeting the aspirations/objectives set out in the Climate Change Act (2008), Energy Act (2008), and Planning Act (2008);
- The conclusions reached in the Stern Report;
- Policy ENG.1 of the East of England Plan (2008); and
- A Climate Change Strategy for Norfolk (2008).

The Committee accepted the above and that the proposed development would undoubtedly have major environmental benefits in terms of producing significant amounts of renewable energy but it was felt that despite the above, the Committee's objections would override these benefits and therefore it was agreed to raise an objection.

The objection to the proposal was raised based on:

- The scale of this proposal in combination with the other permitted offshore wind farm schemes would have a detrimental impact on the North Norfolk Area of Outstanding Natural Beauty and Heritage Coast contrary to Policy ENV.2 of the East of England Plan;
- There was concern that the landscape impact arising from this proposal on the North Norfolk Coast could have a detrimental effect on visitor numbers and the local economy contrary to the objectives set out in Policy E.6 of the East of England Plan;
- There was concern that the proposed cable route and wind farm will have a detrimental impact on the Wash Estuary as a whole, which has a number of national and international nature conservation designations, including: RAMSAR site; National Nature Reserve; Special Protection Area (SPA); Site of Special Scientific Interest (SSSI). As such the proposal is contrary to Policy ENV.3 of the East of England Plan; and
- There was concern that the proposal could have a detrimental impact on the local fishing industry and local economy contrary to the wider sustainable aims of Policy SS.1 of the East of England Plan.

### **Alternative Options Considered**

The Principal Planner's report considered and recommended not raising an objection based on current local and regional policies.

**CHAIRMAN**

The meeting ended at 1.10pm



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**Race Bank Offshore Wind Farm Proposal  
Centrica Energy Ltd**

Report by the Director of Environment, Transport and Development

**Summary**

Consultation by Centrica Energy Ltd for an offshore wind farm and ancillary development approximately 16 miles off Blakeney Point on the North Norfolk Coast. This application will be determined by the Department of Energy and Climate Change (DECC) under Section 36 of the Electricity Act (1989).

The proposal could potentially provide enough electricity for 420,000 homes annually and reduce carbon dioxide emissions in a year by approximately 848,000 tonnes. The proposal is consistent with national, regional and local policies on tackling climate change.

While recognising the significant benefits potentially arising from this proposal, there are serious issues arising about its combined impact along with other permitted and proposed schemes in the area, on the North Norfolk coast (Heritage Coast and Area of Outstanding Natural Beauty), local ecology in the Wash Estuary and impact on the local tourism and fishing economy.

It is recommended that an objection be raised to the Race Bank offshore wind farm.

No highway objection is raised to this proposal.

**1. The Proposal**

1.1. The application for the Race Bank Offshore Wind Farm comprises:

**Table 1**

Location	:	The site is approximately 27 km (16 miles) from the coast of North Norfolk and approximately 28 km from the Lincolnshire coast (see Map 1).
Number of turbines (Indicative)	:	Between 88 (6 MW Turbines) – 206 (3 MW Turbines) all with three blades
Tower Height (maximum)	:	110 metres

Blade Diameter (maximum)	:	140 metres
Mean sea level to tip of blade at highest point	:	180 metres (maximum)
Total Area	:	75 sq.km. (29 sq.miles).
Total Output	:	Installed Capacity of 620 Mega Watts (MW)

1.2. The proposed development also includes:

- Up to three offshore electrical substations comprising a single main deck area of 800 sq. m. With a modular structure measuring 35m x 22m with a height of 11m the structure would be mounted 20m above the lowest tidal level; and
- Up to four export cables, 61km (38 miles) long. Cabling route to landfall on the southern shore of the Wash, to the east of the River Nene (see map 2). The cables would be buried in the seabed to a sufficient depth.

### 1.3. **Grid Connection**

- The cables would be buried onshore for 11km from landfall to a new substation extension located directly adjacent to the existing substation at Walpole, Norfolk.
- Extension of the existing substation at Walpole.

It should be noted that the above onshore works received planning permission in May 2007.

## 2. **Background**

2.1. Table 2 below compares the Race Bank proposal with other permitted and proposed schemes in the area:

**Table 2**

Specification	Scroby Sands Great Yarmouth (Built)	Proposed Sheringham Shoal (Permitted)	Lincs Proposal (Permitted)	Docking Shoal (Proposed)	Race Bank (Proposed)
Tower Height	52 metres	97 metres	100 metres	100 metres	110 metres
Blade diameter	80 metres	150 metres	140 metres	140 metres	140 metres
Total Height to tip of Blade at highest point	92 metres	172 metres	170 metres	170 metres	170 metres
Number of Turbines	38	Up to 108	Up to 83	Up to 166	Up to 206
Km offshore (Norfolk)	2.5 km	17 – 23 km	18 km	14 km	27 km
Area Covered	6.5	35 sq.km.	35 sq.km.	75 sq.km.	75 sq. km

	sq.km.				
Generating Capacity mega-watts (MW)	76 MW	315 MW	250 MW	500 MW	620 MW
Number of homes which could be supplied	52,400	176,000	150,000	340,000	420,000

2.2. While no objection was raised to the Great Yarmouth schemes, the County Council did raise objections to the Sheringham Shoal proposal which was considered on 18 August 2006. Objections were raised on the following grounds:

- The proposal would have a detrimental impact on the North Norfolk Area of Outstanding Natural Beauty and Heritage Coast and be contrary to Norfolk Structure Plan Policy ENV.2; and
- The proposal would appear to have a detrimental impact on the local fishing industry and local economy and be contrary to Structure Plan Policy EC.1.

2.3. Furthermore, this Committee also objected to the Lincs Proposal on 23 March 2007 as it was felt that the Environmental Statement failed to sufficiently address the wider cumulative impacts on Norfolk and the Greater Wash Area. In particular it was felt that the proposal could have serious landscape, nature conservation and economic impacts on Norfolk when combined with further offshore schemes at Docking Shoal and Race Bank.

2.4. The Committee recently objected to the Docking Shoal proposal (February 2009) on the basis of cumulative impact on the AONB and Heritage Coast, detrimental impact on the Wash Estuary and unfavourable impact on the local fishing industry and local economy.

2.5. Table 3 below shows current permitted and planned wind farms off the North Norfolk coast (see map 2):

**Table 3**

Wind Farm	Status	Location off Norfolk Coast	Number of turbines (installed capacity in MW)
1. Lynn	Operational	18km	27 (90MW)
2. Scroby Sands	Operational	3km	30 (76MW)
3. Inner Dowsing	Under-construction	23km	27 (90MW)
4. Sheringham Shoal	Approved/Not started	17km	108 (315MW)
5. Lincs	Approved/Not started	18km	83 (250MW)
6. Docking Shoal	Application submitted	14km	166 (500MW)
7. Cromer	Withdrawn after being Permitted	7km	30 N/A



8. Triton Knoll	No proposals at this time	40km	Not known
9. Dudgeon Shoal	As above	32km	Not known
10. Race Bank	Application under consideration.	27km	Not known

2.6. It should be noted that those schemes already permitted (1-5 above) have the potential to generate around 821MW of energy, which is sufficient to supply more than half a million homes with electricity. Norfolk currently has around 380,000 dwellings with a further 62,000 planned in the period 2006-2021 in the adopted East of England Plan (May 2008). As such there is more than sufficient generating capacity from existing permitted sites to supply Norfolk's domestic electricity needs up to and beyond the current East of England Plan period.

### 3. Policy Context

#### a) National Policy

- 3.1. The 2000 UK Climate Change Programme set out a range of policies and measures to meet the UK's Kyoto Protocol target of a 12.5% reduction in greenhouse gas emissions, below base year levels, between 2008 and 2012; and to move towards a domestic goal of a 20% reduction in carbon dioxide emission below 1990 levels by 2010. The supplement to PPS1, Planning and Climate Change (December 2007) indicates that tackling climate change is a key government priority.
- 3.2. In 2002 the Government introduced the Renewables Obligation (RO). This requires all licensed electricity suppliers in England and Wales to supply a specified and growing proportion of their electricity from renewable sources.
- 3.3. National planning policy on renewable energy is set out in Planning Policy Statement (PPS) 22, Renewable Energy, published in August 2004. However, offshore renewable energy generation projects (such as offshore wind farms) are not covered by the land use planning system. PPS22 does indicate that Regional Spatial Strategies should contain an indication of the output that might be expected to be achieved from offshore renewables. The UK's Renewable Energy Strategy is being formulated and the Department for Business, Enterprise and Regulatory Reform (BERR) will publish responses to a recent consultation in Spring 2009.
- 3.4. The Stern Review, 2006, The Economics of Climate Change, commissioned by the Chancellor of the Exchequer, considered the economics of climate change. It concluded that scientific evidence for climate change is so overwhelming that it presents very serious global risks and now demands an urgent global response.
- 3.5. The Energy White Paper, Meeting the Energy Challenge (May 2007) stated the government's targets for electricity generated from renewable sources. These currently stand at 10% by 2010 and 15% by 2015. The government has also signalled its intention to increase the targets to 20% in 2020.

- 3.6. The Energy Act 2008 implements the legislative aspects of the 2007 White Paper referred to above. It seeks to strengthen the Renewables Obligation to drive greater and more rapid deployment of renewable energy in the UK. The government's long term aspiration is to increase the diversity of the electricity mix, thereby improving the reliability of energy supplies as well as lowering carbon emissions.
- 3.7. The Climate Change Act 2008 underlines the government's commitment to addressing both the causes and consequences of climate change. The Act aims to improve carbon management and help the transition towards a low carbon economy in the UK.
- 3.8. The Planning Act 2008 sections 181 & 182 make specific reference to the need for local authorities and regional planning bodies to tackle climate change.

#### **b) Regional Policy**

- 3.9. The adopted East of England Plan (May 2008) Policy ENG.1 (Carbon Dioxide Emissions and Energy Performance) indicates that local authorities should encourage the supply of "decentralised, renewable and low carbon sources...".
- 3.10. Policy ENG.2 (Renewable Energy Targets) indicates that the development of renewable power generation should be supported, with the aim that by 2010 10% of the region's energy should come from renewable sources, rising to 17% by 2020. These targets exclude offshore wind and are subject to meeting European and international obligations to protect wildlife.
- 3.11. Policy ENV.2 (Landscape Conservation) indicates that local planning authorities (LPAs) and other agencies should afford the highest level of protection to the East of England's nationally designated landscapes, which include in the context of Norfolk the Heritage Coast and Area of Outstanding Natural Beauty (AONB). Within the AONB, priority over other considerations should be given to conserving the natural beauty, wildlife and cultural heritage of each area.
- 3.12. Policy ENV.3 (Biodiversity and Earth Heritage) indicates, *inter alia*, that LPAs should ensure that internationally and nationally designated sites are given the strongest level of protection and that development does not have adverse effects on the integrity of sites of European or international importance for nature conservation and should ensure that new development minimises damage to biodiversity and avoids harm to local wildlife sites.
- 3.13. Policy SS.1 (Achieving Sustainable Development) indicates, *inter alia*, that development should support a sustainable and diverse economy.

#### **c) Local Policy - A Climate Change Strategy for Norfolk**

- 3.14. The above strategy was commissioned by the Norfolk Local Government Association (LGA) and has been agreed by the County Council (2008) and was formally launched on 6 February 2009. The strategy has two high level goals: to mitigate and to adapt to the impacts of climate change. The strategy recognises the need for decisive action now to save energy and reduce emissions in order to avert the worst effects of climate change (e.g. coastal erosion, flooding, water shortages, etc).

- 3.15. With regard to renewable energy, priority is given to understanding the supply and demand in the renewables and low carbon-market. A Norfolk-wide study of the renewable energy market will be commissioned through the Climate Change Strategy with the aim of developing a sustainable energy strategy for Norfolk, which will include targets for the development of renewable energy.

#### 4. **Local Members' Views**

- 4.1. Cllr Derek Baxter has raised concerns about the inefficiency of turbines. However, his main concerns relate to the impact on the fishing industry and the lack of baseline information regarding this issue. The views of other members will be reported at Committee.

#### 5 **Assessment of Proposal**

- 5.1 The assessment below considers the key strategic implications of the proposed Race Bank wind farm on the County in terms of potential benefits, impact on the landscape and seascape, nature conservation impact and potential socio-economic impacts. While the Environmental Statement (ES) also considers the wider implications of the proposal in respect of, for example, shipping and navigation, marine ecology and electromagnetic interference, these matters are generally not considered in the assessment below as they are detailed issues for other consultees with specialist responsibilities to address. The assessment below considers the cumulative impact of the above development, taking into account permitted and recently submitted proposals.

#### 5.2. **Potential Benefits**

The proposed offshore wind farm would produce approximately 1,640 GWh of electricity per year. The total installed capacity of the wind farm would be 620MW; enough to meet the requirements of approximately 420,000 homes. This is potentially enough electricity to meet the needs of all the outstanding (still to build) housing in the Eastern Region to 2021, as set out in Policy H1 of the adopted East of England Plan (i.e. 402,450 dwellings). These figures are based on a net capacity of 30% and take into account: the intermittent nature of the wind; the 'down-time' of the turbines due to maintenance and adverse weather; and other energy losses in cabling etc.

- 5.3. On the above basis the Race Bank wind farm would reduce carbon dioxide emissions by up to 848,000 tonnes per year.

#### 5.4. **Seascape and Visual Impact**

The ES accompanying the application has considered in detail the seascape and visual impact arising from the above proposal. The ES has undertaken a thorough cumulative assessment, taking into account those relevant schemes in Table 3 above (i.e. Lynn, Inner Dowsing, Sheringham Shoal and Lincs which have permission, as well as the Docking Shoal which is at the application stage). The Triton Knoll and Dudgeon schemes have not been considered as part of the cumulative assessment (these schemes are not yet at planning application stage).

- 5.5. The broad methodology set out in the ES is considered sound. However, the judgement of the cumulative impacts is deemed too moderate, as it is felt there is insufficient consideration of the wilderness quality of the coastline. This is

particularly true from Morston and Blakeney Point viewpoints. If Docking Shoal were consented, the additional cumulative impact arising from the Race Bank proposal would, it is felt, be unacceptable.

- 5.6. The photomontages in the ES do not adequately assess the scale of the perceived visual impact, as they do not take into account the perceived enlargement of objects close to the horizon. There is also some concern about the impact on the nightscape of the lights on top of the turbines.
- 5.7. PPS22 (Renewable Energy) indicates that proposals within nationally recognised designations (e.g. Heritage Coast and AONB) should only be granted where it can be demonstrated that the objectives of designation will not be compromised by the development and the environmental, social and economic benefits outweigh any significant adverse effect. While this is an offshore proposal lying outside the AONB (27km off the north Norfolk coast) it is nevertheless felt that there would be an impact on this stretch of the coastline. Given the landscape importance of the north Norfolk coast, the proposal in combination with other permitted and proposed schemes would be contrary to Policy ENV.2 of the East of England Plan.

5.9. **Nature Conservation**

The ES provides a very detailed assessment of nature conservation issues covering: seabed ecology, marine mammals, fish and birds. Other than the latter category, these aspects of the proposal are for specialist consultees to respond to accordingly.

- 5.10. The Wash is designated as a Ramsar site (international designation), National Nature Reserve, Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA). These designations extend inland around the Norfolk Coast.
- 5.11. As part of the ES, 25 boat-based and 15 aerial bird surveys were undertaken over two years. The potential impacts on birds include:
- Cumulative disturbance and displacement effects by the wind farm and associated vessel traffic
  - Cumulative collision risk with turbines
  - Loss of or change of habitat

The overall conclusions reached in the ES suggest that many of the impacts on the bird community would be minor or negligible. A population modelling exercise is currently being undertaken to assess the potential impacts of the wind farm on local Sandwich Tern populations, and the cumulative effects on birds from Race Bank and other proposed wind farms in the Greater Wash are currently under discussion with Natural England and the Joint Nature Conservation Committee.

- 5.12. While it is difficult for officers to comment on the impacts of the proposed cabling route through the Wash Estuary, there are concerns about sediment movement both around the turbines and buried cables. The ES analysis of sediment movement predictions is based on a desk study of existing research. There is concern that little research has been done in this geographic area and no modelling has been undertaken of the cumulative effects of this number of

structures over such a large area. The ES is felt to be insufficiently cautious in its assumption that no net effect will occur on background sediment transport.

- 5.13. Given the high levels of protection afforded to the Wash Estuary and the concerns raised above, it is felt that the proposal is contrary to policy ENV.3 of the East of England Plan

5.14. **Commercial Fishing**

The ES has considered the impact on the commercial fishing industry, defined as any form of fishing activity legitimately undertaken for profit. The principal fishing activities in the area are stated to be pots and shrimp trawling. The assessment methodology follows the Defra 2004 Guidelines and includes consultation with local fishermen's associations. The main concerns of fishermen relate to potential loss of fishing area. This would in fact be the case during the construction phase.

- 5.15. The ES indicates that stakeholders with the potential to be impacted is limited to a few Wells-next-the-Sea based potters and occasional long-line fishermen. The ES concludes that there would be, at worst, a negligible impact on commercial fishing.
- 5.16. However, there is concern that the proposal in combination with other permitted and proposed schemes could have a detrimental impact on the local fishing industry and the local economy, contrary to the wider sustainable aims of Policy SS.1 of the East of England Plan.

5.17. **Highways**

There are no highways concerns relating to the offshore wind farm proposal.

5.18. **Socio-Economic**

As Map 2 shows there are a number of permitted and proposed wind farms off the North Norfolk coast. It is unclear from the applicant's ES what the level of impact would be on the local economy if all these schemes were to go ahead. The ES suggests that Lynn and Inner Dowsing wind farms have provided socio-economic benefits to Skegness and Grimsby. The ES suggests the concentration of wind farms could lead to the establishment of a substantial new UK industry providing long term jobs. However, it is difficult to estimate any long term local economic benefits. There is also a suggestion that some visitors with interests in engineering and the environment may be attracted to the area due to the location of the wind farms. There is no real evidence to back up such predictions.

- 5.19. While the ES suggests that there could be some tourism potential arising from the wind farms, there is no evidence to support this view. Moreover, there are concerns that if all the potential wind farms were to be constructed, there could be an adverse effect on visitor numbers, particularly those currently attracted to the rural and remote nature of the North Norfolk coastal landscape.

6. **Resource Implications**

- 6.1. **Finance** : There are no financial implications to the County Council arising from this proposal.

6.2. **Staff** : There are no staff implications.

6.3. **Property** : None

6.4. **IT** : None

## 7. **Other Implications**

7.1. **Legal Implications** : There are no legal implications.

7.2. **Human Rights** : None.

7.3. **Equality Impact Assessment (EqIA)** : The County Council's planning functions are subject to equality impact assessments. However, as the County Council is simply a consultee on this offshore wind farm application, no EqIA issues have been identified.

7.4. **Communications** : None.

8. **Section 17 – Crime and Disorder Act** No implications.

## 11. **Alternative Options**

11.1. Clearly any decision relating to this proposal needs to balance the local and national objectives for addressing climate change while at the same time needing to protect a very precious and sensitive part of the County's environment. The potential benefits arising from this proposal are significant in terms of the number of households (420,000) which could be supplied with electricity from a sustainable renewable source. This is potentially enough electricity to meet the needs of all the outstanding housing (still to build at March 2006) in the Eastern Region up to 2021. The proposed wind farm could significantly reduce carbon emissions by 850,000 tonnes per year. On this basis, it could be argued that the proposal is consistent with national, regional and local policies on energy and climate change. Therefore, Members may feel that it is appropriate to support this application.

## 12. **Conclusion**

12.1. The proposed Race Bank wind farm development would undoubtedly have major environmental benefits in terms of producing significant amounts of renewable energy. The applicant's Environmental Statement indicates that the proposal could supply electricity for around 420,000 homes and lead to the reduction of up to 848,000 tonnes of carbon dioxide each year. These benefits are clearly consistent with:

- National policy on renewable energy targets
- Meeting the UK's Kyoto Protocol targets for reducing emissions of greenhouse gases
- Meeting the aspirations set out in the Climate Change Act (2008); Energy Act (2008) and Planning Act (2008)

- The conclusions reached in the Stern Report
  - Policy ENG.1 of the East of England Plan (2008)
  - A Climate Change Strategy for Norfolk (2008)
- 12.2. However, offset against these wider benefits, it should be recognised that this proposal is the latest in a series of offshore wind proposals off the North Norfolk coast, which has a variety of national landscape designations (e.g. Heritage Coast and AONB). It is felt that this proposal in combination with other permitted and proposed offshore wind farms would have a detrimental impact on the landscape character of the north Norfolk coast. This in turn could detract from the County's tourism offer and have an adverse economic impact. There are also concerns about the impact on the local fishing industry.
- 12.3. In responding to the last three offshore wind farm proposals (August 2006; March 2007; February 2009) the County Council has taken a cautious view, raising concern about the cumulative adverse impact on the north Norfolk coast. Although the County Council has signed up to the Norfolk Climate Change Strategy (2008) which firmly recognises the need to cut carbon emissions, the potential adverse socio-economic and landscape impacts of the proposal are important material considerations.
- 12.4. Therefore, considering the cumulative impacts of successive proposals in the Greater Wash, it is recommended to raise an objection to this proposal. While previous advice in respect of the Docking Shoal proposal recommended not raising an objection, in this instance it is felt that the combined impact with other permitted and proposed schemes is now too significant in landscape, ecology and local economy terms for this particular proposal to be supported. As such, an objection is recommended to the Race Bank offshore wind farm.

## **Recommendation**

That the Department of Energy and Climate Change be informed that the County Council wishes to raise an objection to the Race Bank wind farm on the following ground:

- 1) The proposal in combination with other permitted and planned offshore wind farm schemes would have a detrimental impact on North Norfolk Area of Outstanding Natural Beauty and Heritage Coast contrary to Policy ENV.2 of the East of England Plan;
- 2) There is concern that the landscape impact arising from this proposal in combination with other permitted and planned wind farms could have a detrimental impact on visitor numbers and the local economy contributing to the objectives of Policy E.6 of the East of England Plan.
- 3) There are concerns about the cumulative impact of this proposal, taken with other permitted and planned schemes, on the local fishing industry and local economy. The proposal is considered contrary to Policy SS.1 of the East of England Plan.
- 4) There are environmental concerns regarding the wind farm and cabling route through the Wash Estuary, which has a number of national and international designations, including: Ramsar site; National Nature Reserve; Special Protection Area; and Site of Special Scientific Interest. As such this proposal is contrary to Policy ENV.3 of the East of England Plan.

## Background Papers

Race Bank Offshore Wind Farm Environmental Statement.

## Officer Contact

If you have any questions about matters contained in this paper please get in touch with:

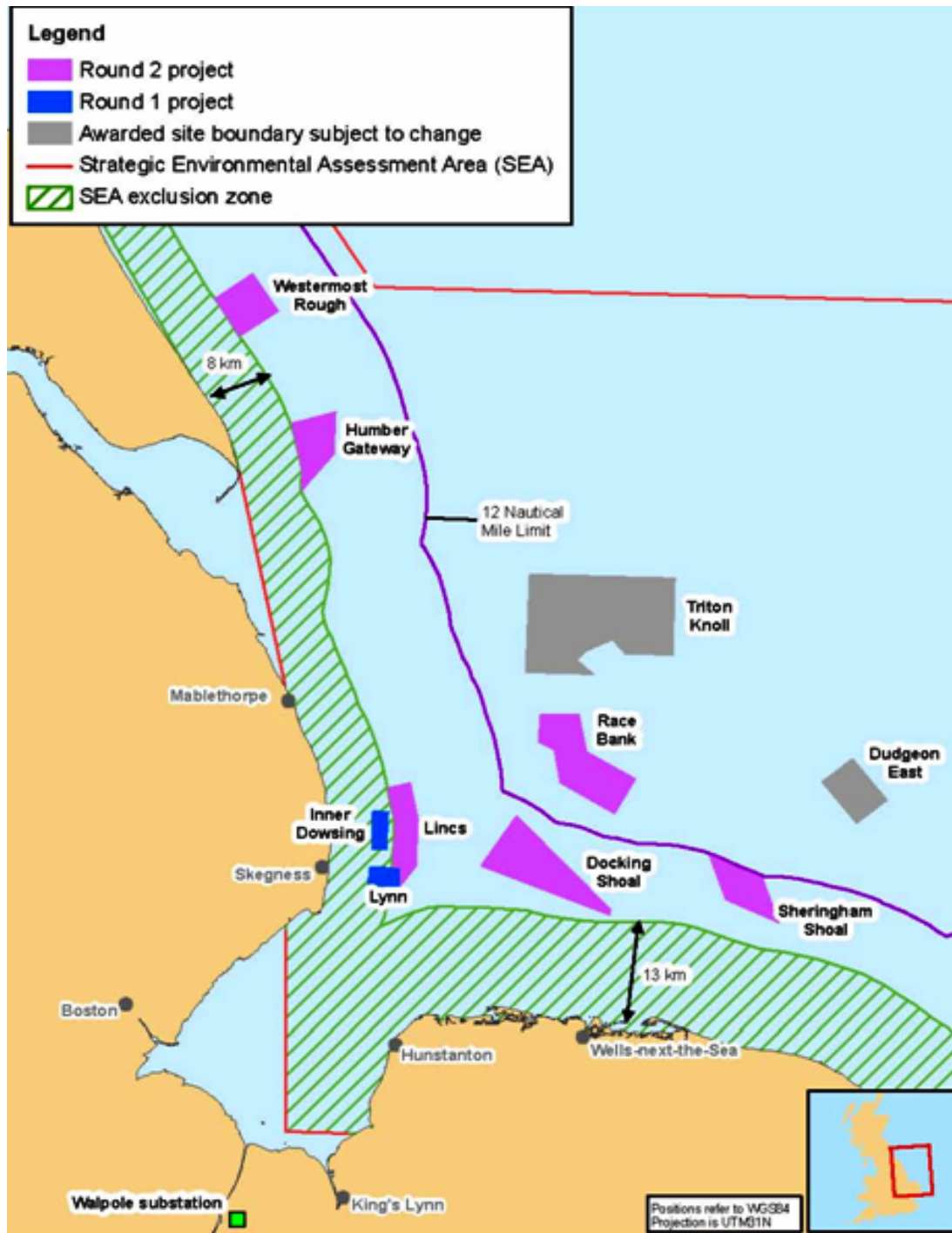
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If you need this report in large print, audio, Braille, alternative format or in a different language please contact Stephen Faulkner on 01603 222752 or textphone 0844 8008011 and we will do our best to help.



Map 1 - Race Bank Offshore Wind Farm



Map 2 - Race Bank Offshore Wind Farm Cable Corridor

