Sophie King

From: Sue Gilson
Sent: 18 January 2015 17:44
To: LDF
Subject: PLAN Selby Consultation

Dear Sir/Madam,

I include below some comments in relation to the PLAN Selby Consultation.

Topic / Chapter: T5 Climate Change and Renewable Energy

Question 26 a - Is it necessary for PLAN Selby to consider : Providing revised targets for the plan period to 2027 for installed renewable energy ?

No.
The targets in the former Regional Spatial Strategy no longer apply therefore there is no benefit in having a target. Simple targets linked to total generating capacity do not take into account the difference in load factor between solar, wind, biomass and anaerobic digesters. The total installed capacity would bear little relationship to the actual energy generated / carbon dioxide saved because the energy is determined by the load factor and the generating capacity. Solar panels have a load factor of around 10% whereas Drax biomass has a load factor of 80%. Wind will vary between 10% for small turbines and 30% for larger ones in very windy locations. The objective is to generate more power from low carbon sources, not to install more capacity that produces little power and damages the environment.

The target included in the Core Strategy is for 32MW generating capacity by 2021. This target was based on assumptions that it would be wind energy based. Due to diversification of renewable energy generating technologies this target has already been greatly exceeded. There is 1000 MW at Drax which has converted to units to fully operate on biomass. Wind farms already operational or approved exceed 32 MW in their own right. In addition to this there are two waste incineration plants either approved or expected to be approved shortly and a number of anaerobic digesters. The total installed capacity in Selby District greatly exceeds 1000 MW and is dominated both by load factor and capacity considerations by Drax biomass.

There should be a policy that is designed to maximise renewable/low carbon energy in such a way that it minimises the adverse impact on the district.

Question 26 d - Is it necessary for PLAN Selby to consider identifying suitable areas for renewable and low carbon schemes ?

No.

Any area that is allocated is almost certain to see wind farm or solar farm proposals which will then be very difficult to refuse. If the criteria are not absolutely unique to those sites then it will be more difficult to argue against proposals at other sites.

If there is no designation the local authority can refuse planning for wind farms and large solar farms. The applicant may well appeal the decision but the appeal is then decided on its merits and gives local residents an opportunity to make their case. Where other developments have already been approved it is then possible to argue on the basis of cumulative impact, which again would be more difficult if the area had been identified as suitable. Attention should also be paid to applications for individual wind turbines on privately owned land as these also have an cumulative effect on the environment and could well contradict the vision of residents having a 'high quality of life in a distinctive rural district ' as envisaged in the Plan.

Selby should not therefore identify areas for wind farms and solar farms because to do so would not limit them to those areas because developers would still be able to propose them on any other site.

Question 26 e Is it necessary for PLAN Selby to consider: Identifying separation thresholds? What might they be?

Yes.

Separation distances are very important. There should be minimum distances for wind turbines, particularly from residential properties. The distances should take into account safety, amenity, visual impact, noise and health issues. The distances may also be linked to turbine size but a **minimum** distance of 1 kilometre from the nearest dwelling seems to have been accepted in some areas.

The number of turbines should also be taken into consideration. It should not be permissible to have more than one turbine at the minimum distance.

Susan Gilson

18th January 2015