

Sophie King

From: SUSAN WELBURN
Sent: 19 January 2015 14:52
To: LDF
Subject: Response to consultation



**Selby District Council Local Plan Consultation
 "PLAN Selby" (The Sites and Policies Local Plan)
 Initial Consultation Comments Form**

Comments are therefore invited as part of this Initial Consultation.

Please use this form to make your comments.

Completed comments forms must be received by the Council
 no later than 5pm on Monday 19th January 2015

Contact Details - Please provide contact details and agent details, if appointed

Personal Details

Name: SUSAN WELBURN

It will be helpful if you can provide an email address so we can contact you electronically

Comment(s)

Please ensure you provide reference to the Question and Topic area for each comment you wish to make.

Climate Change and Renewable Energy

Question 26 a

Is it necessary for PLAN Selby to consider:

a) Providing a revised target for the plan period to 2027 for installed renewable energy

Comment:

NO Any target which included biomass would not be achievable by any other means because of the scale difference - 1000MW versus a few 10's for wind farms and up to 100 MW for each incinerator. We already have Drax and some incinerators and lots of household solar panels so why would we want to have 100 x 410 foot turbines with a capacity of only 250MW instead or as well.

Its more important to consider HOW the energy is produced rather than having a target.

However if you must have a target let it be one we have already achieved and then we need have no more turbines. We already produce a tremendous quantity of renewable energy in this area, let other areas do their bit

Climate Change and Renewable Energy

26 b) Reviewing the 10% onsite requirement?

26 c) Including specific requirements for sustainable building design such as Code for Sustainable Homes and BREEAM, subject to local viability testing

Comment:

NO Selby should not set policies which exceed national standards, the 10% target should be removed and replaced by one which encourages solar on existing roofs and encourages other energy resource efficiency such as heat pumps and biomass, but not to do this in such a way that it is dependent on the level of subsidy. This matter is covered by para 95 of the NPPF, it does not need additional statements.

Climate Change and Renewable Energy continued

Question no.: 26 d) **d) Identifying suitable areas for renewable and low-carbon schemes by technology? e.g. wind, solar, hydro?**

Comment: **NO** Selby should not 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. Also if an area was identified it would have a downward effect on property values in those areas.

Climate Change and Renewable Energy continued

Question no.: Question 26e Is it necessary for PLAN Selby to consider: Identifying separation thresholds? What might they be

Comment: **yes** - separation distances are very important. There should be minimum distances from homes, roads, paths, public areas and railways. The distances should take into account safety, amenity, visual impact noise and health issues. The distances should also be linked to turbine size. Turbines can vary in size between 25 metres and 200 metres. For that reason the distances must be related to total height.

Setting minimum distances is the best way to protect Selby District residents from the worst effects of wind turbines. Many argue for a minimum of 2km but this is unreasonable because it would exclude all turbines, including smaller turbines from most of the District. A minimum distance which is linked to the size of turbine is a better approach and would protect communities as turbines get bigger. 2km is reasonable for the larger turbines (145metres) , it should be even greater for 200 metres turbines, maybe double the distance. Remember a 145m turbine is as tall as a 40 story block of flats!!!

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

Minimum distances should be set for distances from homes, roads, pathways, public areas and areas used for recreational activity.

Climate Change and Renewable Energy continued

26 f f) Incorporating more detailed development management policies for climate change and renewable/low-carbon energy requirements? If so what do they need to cover? For example taking into account cumulative impacts of schemes

It is important that any work done has value and deals with genuine issues. Any policies must be cost effective in dealing with issues that affect numerous planning applications. Candidate subjects that are current include

- Cumulative issues of incineration - traffic and air quality
- Solar farms - visual impact and enclosure of open space
- Wind turbine cumulative visual impacts

Climate Change and Renewable Energy continued

26g While not an SPD the most urgent requirement is to do a detailed landscape character assessment.

This is the key evidence base for wind farm and solar farm proposals. Government has recognised by Ministerial statement that wind farms in flat landscapes have as much impact as they do in hilly landscapes and this has had a significant impact on planning appeals.

The local landscape character is one of the most important factors in determining wind farms applications at appeals.

"By 2027 Selby will be a distinctive Rural District with an outstanding environment, a diverse economy and attractive towns and villages. Residents will have a high quality of life and there will be a wide range of housing and job opportunities to help create socially balanced and sustainable communities, which are less dependent on surrounding towns and cities."

Landscape polices must be put in place if this vision it to be delivered.

Climate Change and Renewable Energy continued

26 h The following are examples of things that should be included in baseline considerations:-

- Flooding - which is attributed to climate change but is more about drainage.

- CHP- ensure that sources of heat from CHP plants is considered in conjunction with potential use of the heat
- Encourage industrial developments to deploy solar panels on roofs
- Encourage biomass heating of industrial premises
- Encourage use of heat pumps - preference should be given to ground source and potential for shared use of the underground heat exchangers.
- Consider the impact and opportunity provided by carbon capture and ensure that sources of carbon other than Drax can use the facility. Site allocation for industrial use should have this as a prime consideration.

Additional Comments - Please provide any additional comments you may wish to make.

- It was not easy to respond to this. Why could the questions not have been presented on a single form that we could work on, save, and complete later?
- There are so many questions – I have only managed to respond to a few in the time given. I would have liked to have responded to more. Could the consultation perhaps have been done in parts?
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Comment Submission Statement

All comments must be made in an email or in writing if they are to be considered. Your comments and some personal identifying details will be published in a public register and cannot be treated confidentially. Where practical, personal identifiers may be redacted, however Selby District Council cannot guarantee that all identifiers will be removed prior to publication of consultation records.

Name - or signature: SUSAN WELBURN

Date: 18 January 2015.