

Sophie King

From: Martin Webster
Sent: 16 January 2015 11:43
To: LDF
Subject: Question 26 Targets

Name - Martin Webster

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

Topic / Chapter
 Question no. 26a

Comments:

NO

You have stated that:

By 2027 Selby District will be a distinctive rural District with an outstanding environment, a diverse economy and attractive, vibrant 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.

This cannot be done with large-scale wind farms throughout the district. A small scale wind farm with very tall turbines has the same visual impact as a large scale development. I am against wind farms as they offer little or no benefit to the communities they blight.

A better solution would be to ensure all new developments (housing or business) have roof-top solar capture (solar panels) included as part of the build to provide for them & to feed back into the national grid. This has a much reduced impact on the surroundings as they are on the rooftops of the buildings

- There is no benefit in having a target when the targets in the former Regional Spatial Strategy no longer applies and the NPPF makes clear that targets are taken as minima and not maxima.
- When RSS targets were still in force, achievement of them carried little if any weight in planning appeals about wind farms. Example decision documents could be found if required.
- Simple targets linked to total generating capacity are ill-conceived because they do not take into account the difference in load factor between solar, wind, biomass and anaerobic digesters. This means that 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. For example Drax biomass has a load factor of 80% whereas solar panels are closer to 10%. Wind will varies 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.
- In the introduction to T5 page 56 of the consultation document "Renewable Energy" is Vaguely defined as incorporating renewable and low carbon and decentralised energy.
- The target included in the Core Strategy is for 32MW generating capacity by 2021. SP16 Page 111. 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.

- Drax would like to convert other units and Eggborough would like to convert to low net CO2 biomass - but the decision rests outside of Selby District with DECC. The achievement of any target which included biomass would depend on central Government decisions and not on Selby planners. As such there is no merit in Selby setting such a target - a separate lower target for wind is pointless because Selby District has the capacity to generate far more renewable energy by other means and at lower environmental cost to the district.
- 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.
- Granular targets which are based on current assumptions about technology serve no purpose as has been shown by the extent to which projections in the AECOM (2011) report, cited as evidence in para 3.125 are already so obviously wrong.

Recommendation - The target at SP17 should not be revised because it is irrelevant. Ideally it would be removed from SP17 and replaced by a policy that is designed to maximise renewable/low carbon energy in such a way that it minimises the adverse impact on the district. If we could generate another 1000 MW from biomass, why would we want to have 100 x 410 foot turbines with a capacity of only 250MW instead or as well.

Question no. 26b

Comments:

YES

- There is no benefit in Selby District setting targets which exceed national standards, especially when it is not clear if these targets can be achieved.
- Any standard which drives up the cost of new homes will act as a deterrent to developers and should be avoided. Developers should be encouraged to make provision for fitting solar panels and heat pumps but actually fitting them should not be mandatory.
- There is a greater opportunity to accelerate renewable energy deployment (solar panels and heat pumps) by supporting deployment on existing buildings than forcing it on new build.
- The market is in any case driven by market subsidies which are determined by Government. Selby District policies should not be dependent upon continued subsidies.
- Supporting the use of heat from CHP plants can be done via other policies which deal with CHP plants.

Recommendation - 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.

Question no. 26c

Comments:

NO - Selby should follow and adhere to national standards. There is no benefit to Selby of imposing standards to those that apply in the rest of the UK. Selby would incur additional costs and if they were higher standards they would deter developers from coming to the district.

Recommendation - Selby should not set policies where the matter is already dealt with by a national standards. The inclusion of the term "subject to viability testing" clearly indicates that there is an expectation that it will increase costs. It will also create work that is not required in other districts and make Selby less attractive to developers.

Question no. 26d

Comments:

NO

Para 97 states They should:

●●consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources;17

Then in note 17 it says

Where plans identify areas as suitable for renewable and low-carbon energy development, they should make clear what criteria have determined their selection, including for what size of development the areas are considered suitable.

Then in para 98 it says

When determining planning applications, local planning authorities should: approve the application¹⁸ if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should also expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

In other words any area that is allocated is almost certain to see proposals that then must be approved, and if the criteria are not absolutely unique to those sites then it will be more difficult to argue against other proposals. In Selby District where the landscape is reasonably consistent having sites allocated would be an expensive and pointless exercise.

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 as we saw at Wistow Lordship 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.

Recommendation - 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.

Question no. 26e

Comments:

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.

The only rule which sets distance is indirect through the ETSU R97 noise rules. These are unique to wind turbines and allow more noise than other industrial equipment and premises. The noise rules do not provide protection for home owners. The rules are also very complex and difficult to enforce. Additional protection against noise nuisance is also required due to the unique characteristic of wind farm noise and the fact that it

is more annoying to people than other types of noise - traffic, aircraft etc. The ETSU Noise rules are also unique in that they allow more noise at night than during the day.

It is a principle of planning law that you are not entitled to a view, but such laws did not foresee structures like wind turbines towering over villages. A minimum distance would provide a level of protection that does not currently exist.

Recommendation - 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 greater for 200 metres turbines).

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.

Question no. 26f

Comments:

Renewable and low carbon energy technologies are evolving rapidly and there is no point developing policies which are irrelevant by the time that they are introduced. Policies should focus on issues which are expected to apply generally. For example policies to deal with Carbon capture and storage could not have been foreseen as a requirement and in any case the project will be determined by national policies. Policies should focus on matters which will relate to large numbers of planning applications and be relevant to more than one type of application.

If a need for such policies is determined to be sufficient to justify the effort and expenditure the following should be considered.

Light pollution - arising from industrial developments and on wind turbines but also including rural domestic.

Air pollution - especially cumulative impact from incinerators

Landscape and visual impact - cumulative impact from renewable energy projects and power generation and distribution.

Traffic - especially heavy goods related to renewable and low carbon energy generation - applies particularly to incineration and anaerobic digestors.

Fencing and enclosures resulting from large scale solar - cumulative impact on the free movement of wildlife.

Recommendation - 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

Question no. 26g

Comments:

The best way to answer this question is to see what subjects other authorities deal with via SPD and select those which are relevant to Selby District.

Candidates would be in the following areas

- Minimum separation distances for turbines
- Amplitude modulation noise conditions for wind farms - although the need for such policies will be influenced by ongoing court cases and Government review.
- Fencing and enclosure issues to do with solar farms.
- Incinerators
- Anaerobic digesters

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.

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

Question no. 26h

Comments:

The question should be asked when the subjects to be covered by site allocations are known.

However 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.

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

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