



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

"PLAN Selby" is the Sites and Policies Local Plan which the Council is developing to deliver the strategic vision outlined in the Core Strategy that was adopted in 2013. When adopted, PLAN Selby will form part of the Local Plan for the District against which planning applications will be assessed.

This consultation is the first stage in our on-going dialogue with you and we hope that you will take time to respond to it and help us move forward. The responses to this consultation will help inform our work and shape the District for the future.

Comments are therefore invited as part of this Initial Consultation.

Please use this form to make your comments.

Please read the main document PLAN Selby and associated papers, which are available on the Council's website at www.selby.gov.uk/PLANSelby and at local libraries and Public Council offices.

You will need to see what is in PLAN Selby in order to make your comments. It contains a wide range of issues and specific questions on which we would like your views. Please make sure you are clear about which part of PLAN Selby you are commenting on and ensure we have your full contact details so we can take your comments into account and so that we can contact you about the next stages.

**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: DOUG FLETCHER

Topic / Chapter: ENGAGEMENT PLAN

Question 4 All Sections

Paragraph: 3.1,3.7-3-9

Comment:

We received a copy of the Plan Selby through our letterbox on the 11th of December.

We were not aware that this was coming out and we had already lost two weeks in the process. To download a document of over 300 pages from the system was not achievable. I attempted to read the document and it is in typical Government speak which is not public friendly. In addition, there are a number of links to other websites to read. To expect the public to respond within the time frame over Christmas and the New Year is totally unrealistic. It would appear it was all deliberate, as the whole document is so confusing so the public would not respond.

An issue of this importance needs careful consideration and whilst I congratulate the Council on their thought process, the implementation process is completely flawed.

CONTINUED....

Question 4 continued ...

The future timetable again is over holidays and very short. It would be beneficial to break down the Plan into digestible sections and send a section to householders over a year and ask for comments and not try to do every thing at once as this is a strategy for the next 15 years.

SUSTAINABILITY APPRAISAL

Question 1

Comment: As there are no policies yet to appraise I cannot comment and these appraisals are required by law and should be provided during the preparation of a Local Plan.

HOUSE BUILDING

Question 7

Comment: Setting a target of 40% affordable is counter productive because it makes it unattractive for developers for the following reasons

- Having 40% affordable puts a limit of the high end property that will sell on such developments
- The profit margin for developers on affordable properties is slender and makes the developments less attractive for builders

Imposing a 40% target in Selby District if it is not imposed by other authorities means that Selby is at a competitive disadvantage and as a result it will be more difficult to achieve targets.

Question 9

Comment: Houses should only be built where people would want to live. If you allocate by percentages, houses could be allocated to land that is subject to flooding. Consideration of the infrastructure i.e. roads; services; schools; shopping; transport links and broadband availability must always be taken into account.

TRAVELLER SITES

Question 13 A

Comment: Selby should not develop its own strategy but should comply with National Policy.

Question 13B

Comment: Travellers should be treated as an ordinary person in the settled community who would not be allowed to flout rules of buying land in Green Belt or open countryside to live without planning permission. Land should be made available in areas that can support the additional influx of children in schools. Travellers should have to comply with the same policies that all other members of the public have to with respect to living standards and locations.

DEVELOPMENT LIMITS

Question 22

Comment: Development limits should be designed such that there are gaps around villages so they maintain their distinctiveness in the environment. Lumby, as an example, should be surrounded by undevelopable land to maintain its hamlet characteristics – a similar case with Hillam / Monk Fryston.

INFRASTRUCTURE

Question 25

Comment: High Speed Broadband and 4G coverage in the Lumby area would appear not to be programmed. If not resolved, this could affect the desire to live in this and the surrounding area.

The impact and route of HS2 /HS3 needs separate detailed discussion to understand the likely implications once the route has been finally defined.

CLIMATE CHANGE AND RENEWABLE ENERGY

Question 26

Paragraph A)

Comment: A target should be set that takes into account what has already been achieved. That target should be supported by a policy that maximises renewable energy including low carbon but minimises the adverse impact on the locality.

Question 26

Paragraph B)

Comment: Yes on the basis that policies do not exceed National Standards. The 10% target should be replaced by one that encourages photovoltaic, solar, heat pumps and biomass, but not in a way that it is dependant on a level of subsidy. Para 95 of the NPPF is sufficient.

Question 26

Paragraph C)

Comment : No. Selby should adhere to National Standards and not be subject to Viability Testing as it will prevent development

Question 26

Paragraph D)

Comment: No. Selby should not allocate specific areas for wind/and solar farms as 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

Paragraph E)

Comment: The short answer is 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 26

Paragraph F)

Comment: Renewable and low carbon energy technologies are evolving rapidly and there is no point developing policies that are irrelevant by the time that they are introduced. Policies should focus on issues that 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. CONT....

Question 26 Paragraph F) continued..

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 digesters.
- 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 26 Paragraph G)

Comment: 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.

From the Selby vision - *"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.

Question 26 Paragraph H)

Cannot comment until other site alloctions have been decided by Selby.

HOUSE BUILDING STANDARDS

Question 33

Comment: Building standards should be National Standards. Any additional requirements set by Selby will inflict additional costs on the Builders and on the Authority. Selby and the surrounding area will become a less attractive place to build and targets will be more difficult to achieve. Section 106 should be realistic for major developments only.

DEVELOPMENT IN COUNTRYSIDE**Question 35**

Comment: All policies should be simplified and not further confused with additional policies. Policies should encourage the re-use of assets. Converting disused farm building for residential use has to be better than allowing them to fall into decay.

From the Selby Vision Statement: *"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"*.

Policies need to reflect this - the countryside between the towns and villages is what enables the Selby District to be distinctive and rural.

Any building that does take place in the country should be of appropriate scale and absorbed within the landscape. There should be policies about the height and extent of development in the countryside. There should be policies to restrict the height of structures and the extent of structures as well as limiting the construction of new roadways.

Solar farms with miles of fencing around them are not going to create an outstanding environment.

Neither will wind turbines which could exceed 1000 feet in height over the plan period.

There needs to be a connection with the Selby Plan and the North Yorkshire Developing Minerals & Waste Plan that affects residents in the Selby area. The Selby plan consultation seems to be silent on this matter.

DOUGLAS J FLETCHER (FBIM, MCIQB)

16th January 2015

Email: ldf@selby.gov.uk

**Post to: Policy and Strategy Team, Selby District Council, Civic Centre,
Doncaster Road, Selby YO8 9FT**