



**Selby District Council  
Local Plan Consultation**

**"PLAN Selby"  
(The Sites and Policies Local Plan)**

**Initial Consultation Comments Form**

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**Please use this form to make your comments.**

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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	Agent Details (if applicable)
Name	Mrs S Kemmery	
Address		
Postcode		
Telephone no.		
Email address		

**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.

Topic / Chapter

Question no.  Paragraph

a) **Setting targets would be counterproductive for the following reasons:**

The last Government set targets which were then abolished by the current Government. I can see no reason to reinstate them, since they did not work.

The targets were based on installed capacity and had nothing to do with the amount of electricity produced. The load factor for Drax or Eggborough is about 80% I believe, whereas the load factor for a wind turbine is less than 30%, and solar panels 10%. Therefore, the power stations produce between 2.5 and 8 times more electricity for every MW of installed capacity. A return to targets based on installed capacity could result in the area being overrun with wind and solar farms, producing very little return in electricity but a large return for the operators.

The Core Strategy gives a target of 32MW of capacity and Drax are already committed to a 1000MW increase. Already approved wind farms, solar farms and digesters increase this 1000MW further. Job done by a factor of 31.25, even without wind, solar etc.!

The extent to which Drax and Eggborough can proceed with further increases is not in the hands of SDC. The Government are in control of the decision. So in order to set a target over which the Council may have control, the power stations would need to be excluded. It is completely unreasonable to set targets in the District which do not take into account the massive contribution made by the power stations. Equally it would be impossible to set a target which included them, since a very small percentage change either way by the power stations would render the target massively over or under achieved.

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In short, targets would be impossible to set, would serve no material purpose and are not a legal requirement.

What is needed instead of targets is an innovative policy which maximises energy produced and minimises the adverse effect on the environment and the countryside.

b) **Again, setting targets which are in addition to those specified nationally is counterproductive.**

This proposal seems to fly in the face of any aim to increase new housing in the District, since it will drive up costs for developers who may then be more inclined to build in surrounding Districts.

There are many buildings in the District, particularly industrial sites, which could add solar panels to their roofs and/or install heat pumps without any detrimental effect on the surrounding environment. Residents and businesses should be encouraged to do so on a large scale. An innovative policy which focusses on this would be welcome.

c) **This matter is already dealt with at national level. There is no need to repeat it or increase the requirement.**

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- d) This is the worst suggestion on the list.
- It is not a legal requirement to do this.
- In practice what would happen, if specific areas were identified, would be:
- A flood of applications for development in the area concerned, which by definition the Council would have to permit.
- It would not stop applications for other areas.
- A specific area, which is probably open countryside at present, would be completely industrialised by digesters, wind farms and solar farms.
- Residents in such a countryside area would have their lives blighted and find themselves living on an industrial estate with a concomitant impact on their house prices. This situation would fly in the face of the Council's stated vision in relation to 'outstanding environment' attractive, vibrant towns and villages' and a 'high quality of life' as espoused in the Core Strategy at point 3.1.
- Applications should be decided on their merits, wherever they are proposed.

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- e) This seems to be the most effective way of protecting residents from the adverse effects of renewable energy developments, particularly wind turbines. I understand that there is legal precedent for Councils to implement such a policy, but it needs to be carefully worded.
- Points to consider when setting the policy in relation to wind farms are:  
Distance from homes, areas of special designation, recreational areas, footpaths / bridleways, and noise should be taken into account.  
The number of turbines proposed needs to be considered. The more turbines are proposed the larger the separation distance should be.  
With the increasing size of turbines (100m at Rusholme, 125m proposed at other sites in the District, 145m proposed elsewhere in the country, and ever increasing sizes as time progresses) it is important to specify separation distances in relation to turbine height (topple distance) and not to stipulate a specific distance.
- f) They could include:  
Solar farms - reduction of agricultural land and open spaces  
Wind turbines - cumulative impact - visual and noise
- g) In the case of wind farms, amplitude modulation must be considered. There is mounting evidence that AM is a growing issue as more wind farms are built. The Council must consider and put into policy a robust condition which protects residents should it occur (and not the standard one touted by the wind industry!). This has been raised with the Council by residents and parish councils many times and has been ignored to date.

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Signed

Dated

17.01.15

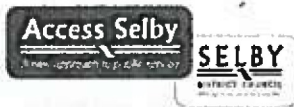
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I am writing this as a resident and stakeholder in Selby District, trying my best to give SDC feedback on PLAN Selby.

The engagement plan is comprehensive with worthy intentions. However there are examples where the Council seems to comply with the plan whilst at the same time making it difficult for consultees.

**Para 2.3**

This para talks about 'early and meaningful engagement and collaboration'. It is clear from the overall timetable at para 3.1 that this consultation is early in the process and meets the 'early' part of stated aim. However it is my contention that within each individual part of the timetable e.g. consultation must be 'early'.

I note that this consultation period runs throughout December and up to 19 January 2015.

I received a copy of your leaflet about the consultation in the post a week or so after the consultation period had started. In my opinion this was too late, particularly given that there are hundreds of pages to read spread across several documents and that we were heading rapidly to the Christmas 'silly season'.

Instead, the Council should ensure that any such communication is delivered to all stakeholders BEFORE the consultation period starts.

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**Para 3.1**

I note that with regard to consultation periods 'Each period will be for a minimum of 6 weeks.'

The current consultation period complies with this aim but, in setting the timescale, account should be taken of complexity of the task for the layperson. The volume of documents which need to be read for this consultation runs into hundreds of pages. Members of the public have busy lives and should not be expected to read this volume of documents, consider them, and write meaningful comment in such a short time, especially at this time of year (see below). It is not their full time job. They are being expected to comment in six weeks on something that has taken many months to write. A six week consultation period would be acceptable for a much shorter document (say, a maximum of 50 pages).

I note from the timetable outlined that:

- the first consultation is Dec 2014 (extended to mid Jan 2015) which means that no-one will look at it until January - when they have about two weeks to read hundreds of pages in order to make a contribution
- the second consultation is planned for July/Aug 2015 which coincides with holiday periods for most people and where again there will no doubt be many pages to read.
- the publication of the submission draft is planned for Dec 2015, again coinciding with preparations for Christmas.
- the EIP is similarly scheduled for July/Aug 2016, again coinciding with holidays.

In short, every time the public are to be involved in this process is during a holiday period.

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A cynic may conclude that this timetable has been constructed for the convenience of the Council's work patterns, not the consultees. It actively discourages a response and comes across as a box ticking exercise.

I suggest that, when compiling the timetable, December, July, August and the weeks in which Good Friday and Easter Monday fall, are set as 'dead' periods and that any consultation period EXCLUDES these times. If this is not possible then the timetable needs to be reworked so that the Council are timetabled for action at those times.

**Para 3.11**

I also note the following:

'Representations may be made in writing including by email  
We will provide questionnaires or forms to complete in hard copy or electronic format  
We will consider the use of questionnaires using online survey software'

For the current consultation the Council have complied with the first two parts of this aim, but have done so in such a way that makes the task of giving feedback exceptionally difficult.

The SDC website says that the Council's form must be used. It is a pdf which can be completed online. That is where the 21<sup>st</sup> century technology ends. It is not possible to save a copy of what you have written. This effectively means that it has to be printed off (twice) and a copy sent in the post. Alternatively you can print it off, scan it into your PC and then send it as an attachment in an email.

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This is far too laborious and time consuming in 2015; it is more reminiscent of the 1990's.

The net effect again is that it discourages response and gives the impression that this is a box ticking exercise.

My suggestions are for the Council to use all the following methods:

Online survey software is used (as at your third point above) which enables consultees to complete a form, save a copy for reference and submit it direct (without use of email). The spaces for comment on the form should be open ended so that consultees do not have to go to an additional comments box, thus avoiding confusion for both consultees, and the Council employee's reading it.

Comments are accepted by email without use of the form. Consultees can be asked to make it clear which question or section they are commenting on.

Comments are accepted by post either on the form or by letter. Again consultees can be asked to make it clear which question or section they are commenting on.

By doing it in this way the Council will encourage replies from more consultees and will be taking account of the wide ranging variance in technological ability across the population.

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

In summary - The Council appears to have met their stated aims for the consultation process but have done so in a way which makes it difficult for stakeholders and easy for Council employees. If the Council really wants a proper consultation they need to make it much easier for people to contribute.

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## Comment(s)

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Topic / Chapter

Question no.

28

Paragraph

I live in a listed building on the Gateforth Hall estate, which includes several listed buildings. It seems to me that protection of individual assets is adequately covered. What is not adequately covered however is the protection of listed buildings from encroachment and harm by other developments. A policy is needed which ensures that there is no encroachment on these assets or their setting.

It is the setting in particular that is of concern. My understanding is that the NPPF encourages a wide interpretation of the setting of listed buildings. However, this does not play out in practice, as I believe that often it is only the grounds of the property that are deemed to constitute the setting.

Criteria should be established on the matter of setting and I give the following as an example. The Gateforth Hall estate consists of the following listed buildings:

Church Lodge - Grade 11

Gateforth Hall - Grade 11\*

Coach House - Grade 11

West Lodge - Grade 11

In addition to these there are the original servants' quarters at the rear of the Hall and the original gamekeeper's cottage in the village. The farms in the village also originally belonged to the estate.

The proper analysis of the setting of these properties should be collective not individual. It should include the whole of the original estate and not merely the garden of each listed property.

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28

Paragraph

Otherwise the nett effect could be that owners have detailed rules to follow if they wish to make changes to their property, but may then be subjected to encroachment by other developments which breach the integrity of the history of the property and the estate. In this instance I am thinking about the Woodlane wind farm proposal and the showman's site at the old mushroom farm.

I am sure that there may be other similar examples in the District, but if there are not, consideration needs to be given to this as a special case.

For this reason I believe that current policies do not deliver an adequate interpretation of the setting of listed buildings.

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I understand that National Heritage are the custodians of the database of listed buildings, which presumably they keep updated. I can see no reason why the Council should have a separate list if that is available for reference. It seems like a waste of effort when what is needed are policies as outlined above.

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