

Selby District

Submission Draft Core Strategy

Publication Version January 2011

Representation Form

Part A

In completing this representation form, you are providing a formal consultation response under Regulation 27 of the Town and Country Planning (Local Development)(England) Regulations 2008 with regard to the Selby District Submission Draft Core Strategy DPD on grounds of soundness only.

Please complete separate copies of Part B (pages 3 and 4) of this form for each section, policy, table, map or diagram about which you wish to comment.

If you believe that a section, policy, paragraph, table, map or diagram is unsound with regard to more than one test of soundness please provide a separate representation for each test.

The Tests of Soundness

Soundness is explained in PPS12 (Planning Policy Statement 12) in paragraphs 4.36 - 4.47, 4.51 and 4.52 and the boxed text. Specifically paragraph 4.52 states that to be sound a Core Strategy should be:

1 Justified

PPS12 provides that to be 'justified' a DPD (in this case the 'Core Strategy') needs to be :

- founded on a robust and credible evidence base involving:
 - evidence of participation of the local community and others having a stake in the area
 - research/fact finding - the choices made in the plan are backed up by facts
- the most appropriate strategy when considered against reasonable alternatives

2 Effective

PPS12 states that Core Strategies should be effective. This means:

- Deliverable - embracing:
 - Sound infrastructure delivery planning
 - Having no regulatory or national planning barriers to delivery
 - Delivery partners who are signed up to it
 - Coherence with the strategies of neighbouring authorities
- Flexible
- Able to be monitored

3 National Policy

The DPD (in this case the 'Core Strategy') should be consistent with national policy. Where there is a departure, the Local Planning Authority (LPA) must provide clear and convincing reasoning to justify their approach.

Completed representation forms must be returned to the Council no later than 5pm on Monday 21st February 2011.

Email to: ldf@selby.gov.uk (Please save a copy to your computer prior to e-mailing your response)

Post to: LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby YO8 4SB

Contact Details (only complete once)

Please provide contact details and agent details, if appointed.

	Personal Details	Agents Details (if applicable)
Title	MR	
First Name	DUNCAN	
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Job Title (where relevant)		
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You only need to complete this page once. If you wish to make more than one representation, attach additional copies of Part B (pages 3 and 4) to this part of the representation form.

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

Part B (please use a separate sheet (pages 3 and 4) for each representation)

Please identify the part of the Core Strategy to which this representation refers:

Section No.	<input type="text" value="7"/>	Policy No.	<input type="text"/>	Paragraph No.	<input type="text" value="ALL"/>
Map No.	<input type="text"/>	Figure No.	<input type="text"/>	Other	<input type="text"/>

Question 1: Do you consider the DPD is:

1.1 Legally compliant Yes No

1.2 Sound Yes No

If you have entered No to 1.1, please continue to Q2. In all other circumstances, please go to Q3.

Question 2: If you consider the DPD is unsound, please identify which test of soundness your representation relates to:

(Please note you should complete separate Part B (pages 3 and 4) of this form for each test of soundness the Core Strategy fails.)

2.1 Justified (Please identify just one test for this representation)

2.2 Effective

2.3 Consistent with national policy

Question 3: Please give details of why you consider the Core Strategy DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The whole of Section 7 (Improving the Quality of Life) is unsound as it relies on key principles from National Policies which are equally unsound. The issues in question relate to the relationship between climate change and CO2 emissions. There is no scientifically proven causal link between CO2 levels in the atmosphere and climate change. Therefore there is no validity in the argument that emissions of CO2 are the main cause of climate change as stated in clause 7.5. It follows that any reference to low carbon technologies being necessary to minimise the effects of climate change are equally invalid. Therefore Section 7.11 which confirms Selby District Council's compliance with National Policy PPS22 (Renewable Energy) is unsound.

Section 22 of PPS22 (Noise) states that the 1997 report by ETSU for the DTI should be used to assess and rate noise from wind energy development. The ETSU report is an unacceptable guideline for the following reasons:
It is based on out-of-date research and standards and contains anomalous statements on noise levels.
It does not contain any reference to recognise the serious health risks posed by infrasound, a subject that was not well understood at the time the report was written.
It uses a noise measurement scale (dBA) which is inappropriate as a means of assessing the effects of low frequency noise on human beings. Section 22 of PPS22 is unsound and inappropriate as a means of determining the separation distances between windfarms and existing housing or commercial properties.

(Continue on a separate sheet if submitting a hard copy)

Question 4: Please provide details of what change(s) you consider necessary to make the Core Strategy DPD legally compliant or sound, having regard to the test you have identified in Q2 where this relates to soundness. You will need to say why this change will make the Core Strategy DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see response to Question 4 at the end of this form.

(Continue on a separate sheet if submitting a hard copy)

PLEASE NOTE your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination. For further information on the stages see The Planning Inspectorate website (http://www.planning-inspectorate.gov.uk/pins/appeals/local_dev/index.htm)

Question 5: Can your representation seeking a change be considered by written representations, or do you consider it necessary to participate at the oral part of the examination?

5.1 Written Representations

5.2 Attend Examination

5.3 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

(Your request will be considered by the Inspector, however, attendance at the Examination in Public is by invitation only).

Representation Submission Acknowledgement

I acknowledge that I am making a formal representation under Regulation 27 of the Town and Country Planning (Local Development)(England) Regulations 2008. I understand that my name (and organisation where applicable) and representation will be made publically available during the public examination period of the Core Strategy in order to ensure that it is a fair and transparent process.

I agree with this statement and wish to submit the above representation for consideration.

Signed D. Lorriman

Dated 14th February 2011

Question 4

In order to correct the unsound aspects of the Core Strategy, it is necessary to remove from the document all references to CO2 and fossil fuels as being responsible for climate change; similarly also any references to low carbon technologies. The gradual depletion of the world's finite fossil fuel reserves certainly indicates the need to conserve these valuable resources by improving the efficiency of energy usage and maximising the generation of energy from renewable sources. But this is no reason to present the usage of fossil fuels and the generation of CO2 as being responsible for climate change. The link between the two, being expressed as it is in Section 7, is totally unproven and this makes the document unsound scientifically.

There is now ample scientific proof that the minute levels of CO2 in the atmosphere are not a significant contributor to climate change (global warming). There are numerous websites that attest to this fact, supported by the majority of scientific opinion. The biased views of the vested interests pursuing the CO2 myth have now been well and truly discredited and there is no longer any case for SDC to follow blindly the flawed national policy in PPS22.

Re section 7.11 and the requirement to follow national policies on renewable energy. When considering PPS22 Section 22 (Noise), the use of ETSU-R-97 should be replaced with a policy based on the proceedings of the First International Symposium on the Global Wind Industry and Adverse Health Effects - Picton Ontario Canada October 2010, this being the latest scientific consensus on the issue of windfarm noise.

If SDC reject this submission and decline to alter Section 7 as requested, then the Council should be prepared to enter into a public debate on the subject of Section 7 and the related national policies. Public opposition to the climate change CO2 myth is now too strong to be ignored.